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POLLUTION OF THE INTERSTATE WATERS OF  
THE MERRIMACK AND NASHUA RIVERS AND  
THEIR TRIBUTARIES, MASSACHUSETTS -  
NEW HAMPSHIRE AND THE INTRASTATE POR-  
TIONS OF THOSE WATERS WITHIN THE STATE  
OF MASSACHUSETTS. SECOND SESSION RE-  
CONVENED IN WORKSHOP SESSIONS. PRO-  
CEEDINGS OF CONFERENCE HELD AT BEDFORD,  
NEW HAMPSHIRE AND TEWKSBURY, MASSA-  
CHUSETTS ON OCTOBER 20-21, 1970. VOLUME I

Federal Water Pollution Control Administration  
Washington, D. C.

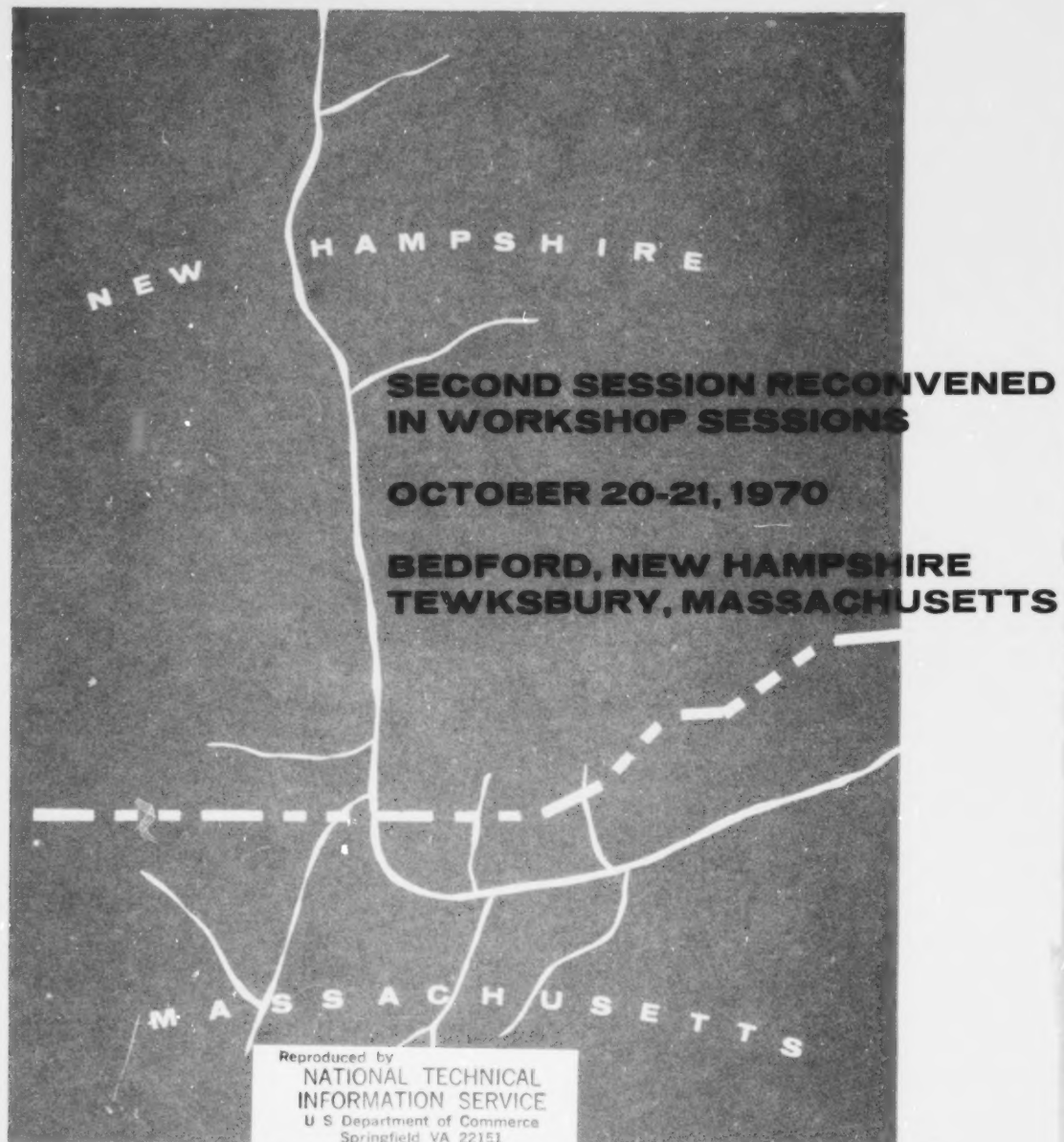
21 October 1970

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# PROCEEDINGS



## CONFERENCE

**In the matter of Pollution of the Interstate Waters of the Merrimack and Nashua Rivers and their Tributaries, Massachusetts-New Hampshire and the Intrastate Portions of those Waters within the State of Massachusetts.**



SECOND SESSION  
(Reconvened in Workshop Sessions)  
of  
CONFERENCE IN THE MATTER OF  
POLLUTION OF THE WATERS OF THE  
MERRIMACK AND NASHUA RIVERS  
AND THEIR TRIBUTARIES

Sheraton Wayfarer Motor Inn  
Bedford, New Hampshire  
October 20, 1970  
and  
Holiday Inn  
Tewksbury, Massachusetts  
October 21, 1970

Volume I

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WORKSHOP SESSION

*The report on*  
 The second session of the Conference in the Matter on  
 of Pollution of the Waters of the Merrimack and Nashua Rivers  
 and their Tributaries was reconvened in workshop session  
 at 9:40 a.m., Tuesday, October 20, 1970, at the Sheraton  
 Wayfarer Motor Inn, Bedford, New Hampshire.

PRESIDING:

*It includes statements, discussions,  
 and recommendations on: Classification  
 of streams for pollution statement  
 industrial statements;  
 questions and  
 answers; and  
 related information.*

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Opening Statement - Mr. Klashman

P R O C E E D I N G S

OPENING STATEMENT

BY

MR. LESTER M. KLASHMAN

MR. KLASHMAN: The meeting is open.

This is a workshop session for the second session of the conference in the matter of pollution of the waters of the Merrimack and Nashua Rivers and their tributaries in the States of New Hampshire and Massachusetts.

The first session of this conference was initiated in 1964 in accordance with a request from Endicott Peabody, then Governor of Massachusetts, and on the basis of reports, surveys, or studies under the provisions of the Federal Water Pollution Control Act. The first session was held on February 11, 1964, with the second session held on December 18, 1968.

Both the State and Federal Governments have responsibilities in dealing with water pollution control problems. The Federal Water Pollution Control Act declares that the States have primary rights and responsibilities for taking action to abate and control pollution. Consistent with this, we are charged by law to encourage the States in these activities.

At the same time, the Secretary of the Interior is

Opening Statement - Mr. Klashman

charged by law with specific responsibilities in the field of water pollution control in connection with pollution of interstate and navigable waters. The Federal Water Pollution Control Act provides that pollution of interstate or navigable waters which endangers the health or welfare of any persons shall be subject to abatement. This applies whether the matter causing or contributing to the pollution is discharged directly into such waters or reaches such waters after discharge into a tributary.

The purpose of the conference procedure is to bring together the State and interstate water pollution control agencies, representatives of the U. S. Department of the Interior, and other interested parties to review the existing situation and the progress which has been made to comply with the conference recommendations, to lay a basis for future action by all parties concerned, and to give the States, localities, and industries an opportunity to take any indicated remedial action under State and local law.

Under the conference procedures, through a cooperative State-Federal effort, remedial programs have been established for the Merrimack-Nashua Rivers. Through these workshop sessions, we will evaluate the effectiveness of the present pollution abatement programs with a view toward developing further requirements where indicated. These workshops will



Opening Statement - Mr. Klashman

allow us to examine particular problem areas in depth and will provide the opportunity for the presentation of statements and views by all water use interests for the consideration of the conferees.

The schedule for the workshops is as follows:

In Bedford, New Hampshire, October 20, 1970, at the Sheraton Wayfarer Motor Inn, Derryfield Meetinghouse.

On October 21, 1970, tomorrow, we will meet in Tewksbury, Massachusetts at the Holiday Inn in the Lowell-Tewksbury area, Commonwealth Suite, 95 Main Street, Tewksbury, Massachusetts.

The conferees at today's workshop are as follows:

The Massachusetts Department of Natural Resources is represented by John Casazza.

The New Hampshire Water Supply and Pollution Control Commission is represented by William Healy. I believe Mr. Palazzi, the chairman of Mr. Healy's Commission, will be here very soon.

The representative of the New England Interstate Water Pollution Control Commission is Mr. Alfred Peloquin.

Edward Fitzpatrick is the Federal conferee at this workshop session, and he is Director, New England Basins Office, of this region of the Federal Water Quality Administration, U. S. Department of the Interior, with headquarters in Boston,



Opening Statement - Mr. Klashman

Massachusetts.

My name is Lester M. Klashman. I am Regional Director, Northeast Region of the Federal Water Quality Administration.

Now a word about the procedures governing the conduct of the meeting. The conferees will be called upon to make statements. The conferees, in addition, may call upon participants whom they have invited to the meeting to make statements. In addition, we shall call on other interested individuals who wish to present statements. The U. S. Department of the Interior has also invited a number of municipalities and industries and citizens' groups to participate in the workshop sessions. At the conclusion of each statement, the conferees will be given an opportunity to comment or ask questions, and I may ask a question or two. This procedure has proven effective in the past in reaching equitable solutions.

A record and verbatim transcript of the meeting is being made by Joe McLaughlin, Ace-Federal Reporters, Inc., Washington, D. C. This is being made for the purpose of providing a complete record of what is said here.

I would suggest that all speakers and participants other than the conferees making statements come to the lectern and identify themselves for purposes of the record.

I should now like to ask Mr. Healy whether he would

W. A. Healy

care to make a statement.

STATEMENT BY

WILLIAM A. HEALY

EXECUTIVE DIRECTOR

NEW HAMPSHIRE WATER SUPPLY AND POLLUTION CONTROL COMMISSION

CONCORD, NEW HAMPSHIRE

MR. HEALY: Mr. Klashman, thank you.

Chairman John Palazzi was expected to be here at the appointed time. He is late, and he asked me in his absence to make this statement. I expect that he might be here at any time.

Before doing so, I would like to take note of the fact that we also extended invitations to the industries and municipal officials to whom you wrote asking them if they so desired to make their statements here. We would appreciate it if they will do so. I know at least one city is represented this morning by City Manager John Henchey, and he will speak very shortly.

In addition to myself, Clarence W. Metcalf, our Director of Municipal Services, is here. Undoubtedly, he will become involved in the discussions as they proceed.

One of my other Commissioners, Bernard Corson, Director of Fish and Game, is sitting down here in the audience, and he may want to add something to the proceeding later.

W. A. Healy

With that brief introduction, Mr. Klashman, I will read the statement for the record. It is entitled "Status of Water Pollution Control Program on the Merrimack River and Nashua River Watersheds."

Prior to going into detail on pollution control efforts throughout these two watersheds, we should first go into the history of legislative action in New Hampshire leading to classification of these surface waters.

Eleven years ago, in 1959, the main stream of the Pemigewasset River was classified "D" by the New Hampshire Legislature. Municipalities, along with industries, dumping domestic or industrial wastes into these waters were given 10 years to comply with the classification.

In 1967, the Pemigewasset was reclassified and the major part of the river upgraded to "B" category, with one small portion reclassified as "C" waters.

In the same legislative session -- that is, 1967 -- the main stream of the Merrimack River was classified for the greater part of its length as class "B," with two short stretches, one in Manchester and the other from the confluence of the Nashua River to the Massachusetts line, class "C."

The Nashua River is classified as "C." It was so classified in 1965 and remains in this category at the

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present time.

With the classification of the main stem of the Merrimack River, it was necessary to issue orders to 10 municipalities and 17 industries. Some of the municipalities, notably Nashua and Hooksett, have not waited until classification of the river to initiate work in the field of pollution abatement. Nashua's primary treatment plant was in operation several years prior to classification of the river, and Hooksett's secondary plant was well under way when the law went into effect.

Other municipalities receiving orders along the river, from north to south, were Franklin, Merrimack County Home, Boscawen, Concord, Pembroke, Allenstown, Manchester, Merrimack, and Hudson. These towns and cities had all retained consultants and most had completed reports well in advance of the 1967 classification date.

Pollution abatement facilities for these towns and cities located along the main stem of the Merrimack, and including that portion of the Nashua which will go into the Nashua city plant, total in excess of \$75 million. Of this amount, over \$18 million is now being prefinanced by local communities or by the State of New Hampshire itself.

We should add here that the State passed a modest prefinancing program in the last regular legislative session, making it possible for several municipalities to proceed



W. A. Healy

with construction. New Hampshire supplies the 50 percent Federal share under this legislation.

Obviously, the lack of Federal funds required this prefinancing program if the construction of water pollution control facilities were to proceed in line with municipal and State plans.

In another instance, a town has prefinanced about \$10 million of work, making it possible for a large industry to locate within its boundaries. The residents of this municipality are extending their own credit with the hope that the Federal share will be forthcoming in the future.

Going back to the headwaters of this river system, it was pointed out that the municipalities and industries were given 10 years to comply with the original classification. Except for extensions of a few months, the 10-year period remained in effect even after the reclassification in 1967. To date, over \$10 million worth of work has been accomplished along the Pemigewasset and its major tributaries.

Well before the 1969 expiration date of the legislative order, the small town of New Hampton had its collection and treatment system in operation. Following New Hampton, Plymouth, Ashland, Lincoln, Woodstock, Bristol, and the Draper Corporation have completed collection and treatment facilities.



W. A. Healy

At this time, there is not one municipality or operating industry in the 30 miles along the Pemigewasset River and its east branch which has not complied with the order to abate pollution.

This municipal-industrial program throughout the watershed has brought about a remarkable upgrading of the quality of this river in less than 1 year, and it is obvious to anyone observing this change that there will be complete rehabilitation of these surface waters in the very near future.

In summary, the New Hampshire Water Supply and Pollution Control Commission has implemented legislation classifying the Merrimack and Nashua watersheds. It has proceeded in an orderly manner to require the construction of water pollution control facilities from the headwaters down through the basin. It has placed under order every municipality and industry which at this moment is putting untreated wastes into the waters of these watersheds.

It has worked closely with all municipalities in the planning and construction of municipal or municipal-industrial waste treatment facilities. It has, with the support of the New Hampshire General Court, made possible a State prefinancing program, thus permitting construction which otherwise would have to be deferred for several years

W. A. Healy

because of the lack of Federal funds.

We consider this State has made a very real effort over the past several years to implement all aspects of the water pollution control program, and we now ask that the Federal Government make a similar effort and at least bring its appropriations in line with the past authorizations.

In addition, we would recommend that the Federal grants program become more realistic and base its allocations to a large extent on existing needs within the individual States.

This, Mr. Chairman, completes the formal presentation at this time.

MR. KLASHMAN: Thank you, Mr. Healy.

As you know, the appropriations are a function of the Congress of the United States, and we, of course, have no control over this. But your comments certainly are helpful and will be in the record.

Mr. Healy, would you like to call on anyone else at this time?

MR. HEALY: Yes. Mr. Chairman, I think I would like to ask City Manager John Henchey be given an opportunity to make a few remarks. I don't believe he has a prepared statement, but he will speak to the point and explain what the city of Concord is doing.

John Henchey

STATEMENT BY

JOHN HENCHEY

CITY MANAGER, CONCORD, NEW HAMPSHIRE

MR. HENCHEY: Mr. Chairman and members of the Commission, I am John Henchey, the City Manager of Concord.

First, I would like to say that I think, in relation to financing at the Federal level, the city of Concord's thoughts parallel those of the Commission, perhaps being somewhat stronger because at the local level we find the availability of dollars I think much harder or much scarcer than even the State Government does.

The city of Concord currently, if it is to meet the demands of the Federal Government and the New Hampshire Water Supply and Pollution Control Commission, must build 2 sewage treatment plants. These plants are estimated to cost somewhat in excess now of \$15 million.

Current estimates on our first plant in the Penacook area of Concord, on which the plans and specifications have just been completed, would indicate that this project alone may cost in excess of \$6 million. Therefore, our projected estimates for the Central plant would perhaps be in excess of \$10 to \$12 million.

Granted all of these costs, with adequate financing from the Federal level they can be built. There has been a

John Henchey

problem, as everybody has indicated, with Federal funds being made available.

The city of Concord has consistently supported the State Commission at the legislative level in the State of New Hampshire with prefinancing bills in order to take care of New Hampshire's and Concord's needs in the sewage abatement field. However, I do feel in this next session of the legislature, in which I am sure more prefinancing bills will be presented at the State level, prefinancing -- because of lack of Federal support in this area -- will probably have a much rougher road than it has had in the past.

Without prefinancing or continued prefinancing at the State level, the city of Concord will not be in a position to build its downtown sewage treatment plant.

There is one area which people I think have consistently glossed over in the area of pollution control, and this is a problem of older municipalities in New England, of which Concord is one, being several hundred years old, in which they are currently saddled with many, many miles of combined sewers. This means that, in order to construct and operate an effectively operating sewage treatment plant, these sewers must be separated.

In the city of Concord alone, we expect that it



John Henchey

will cost several millions of dollars if we are going to entirely or properly separate our sanitary sewers from our storm sewers. Frankly, we don't know how we will ever finance this kind of money.

Thank you.

MR. KLASHMAN: I wonder if we might ask you a few questions.

Mr. Healy, do you have any questions?

MR. HEALY: No questions. I would merely make the observation that the city of Concord has worked with us closely. There is a sound working relationship there, and I am certain it will continue in the future.

MR. KLASHMAN: As I understand it, you have three projects in Concord. One is the primary plant in North Concord. The second project is a secondary treatment plant for South Concord. The third project is upgrading the North Concord plant to secondary.

MR. HENCHEY: As I understand it, the North Concord plant, which is the one in the Penacook area, as built will be a combined primary and secondary treatment plant and essentially will be accomplished as a single project.

MR. KLASHMAN: The schedule that the State previously submitted called for the various steps, preparation of preliminary plans, the completion of the final plans,



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the financing, the start of construction, and the project going into operation. On that North Concord plant, could you update us on where you stand, first on the preliminary plans?

MR. HENCHEY: All right. As I understand it, plans and specifications were to be completed by June of this year. This is the last schedule that I have. They were completed and in the hands of the State Commission for review early in October of this year. The contract will be let just as soon as approval is received and financing is arranged.

MR. KLASHMAN: Well, the --

MR. HENCHEY: I think right now it is beyond the control of the city of Concord as far as contracts are concerned. But we are prepared when we know the dollars involved, when this is let out to bid, to finance some money.

MR. KLASHMAN: Well, the plans and specifications were completed in June of 1970? Right?

MR. HENCHEY: They were completed. They were to have been completed in June of 1970. Our consultant completed these plans in September, and we had reviewed them and had them in the hands of the Commission early in October for their review. This is where they are at the present time.

MR. KLASHMAN: When do you plan to have the financing completed?

MR. HENCHEY: I think that we have to know the

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number of dollars involved, and the financing can be completed within 30 days from the time that we know what the dollar sign is for construction of this facility.

MR. KLASHMAN: Is there an estimate by the consulting engineer?

MR. HENCHEY: Well, he is just drawing this up. He has just given us a rough estimate, and this is not an engineering estimate as yet. We would expect we would have this information within the next 30 days.

MR. KLASHMAN: So that would be --

MR. HENCHEY: This is the figure I gave you of approximately \$6.5 million. But this is not an estimate with sufficient information for us to go to financing at this point.

MR. KLASHMAN: Do I understand correctly then that you expect firm estimates by November 20? In a month? In 30 days? By November 20th of 1970? And that within 30 days after that you will complete financing? Is that a fair statement?

MR. HENCHEY: Yes, I think it is.

MR. KLASHMAN: In other words, what you are saying is that the financing will be completed by December?

MR. HENCHEY: I would say December or early in January. This is our intent. Now, we have to schedule

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public hearings. Public hearings can be scheduled within this time limit. And I see no reason why, with city council authorization, they would not be scheduled.

Now, there could be other factors involved.

MR. KLASHMAN: Mr. Healy.

MR. HEALY: Yes, I think there are a few other things.

I am pleased to see that the city is so anxious to complete this process. But there will be a period of plan review in our office of some substance. It will take a couple or 3 months to get plans completely examined and necessary corrections made after consultations with the engineer. Then there will have to be a period allowed for the city to take bids and review same.

So if we could get this project under way by early spring, taking bids during the winter season, I think that this would probably be as optimistic a schedule as we can anticipate.

MR. KLASHMAN: The financing then you are saying would be done by February? Is that what you are saying?

MR. HEALY: I think as soon as the bids are received and the city has made an award or wants to, that is the time when they will probably finalize the financing. Do you agree?

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MR. HENCHEY: I am not sure whether the city could finance on the engineer's estimates or the contract price. We would much rather finance based on the contract price if we could. And I would assume that probably the council may take this attitude. I think it is proper, Mr. Healy.

MR. HEALY: To me the important consideration is to get the project going by spring. We would have liked to have started it this fall, but, unfortunately, events occurred that we didn't anticipate, so we lost out.

But next spring, if we can get it wound up then and on the road toward construction, it will certainly conform to what the Commission expects in the way of schedule and what the city is able to produce.

MR. KLASHMAN: Mr. Healy, do I understand correctly that what you are saying is that the project will be advertised for bids in the spring -- that is, let's say, by March of 1971? The contract will be awarded you say by the end of spring, which would be June? The contract will be awarded by June of 1971? And the financing will be completed by June of 1971? Is that a correct statement?

MR. HEALY: Yes.

MR. KLASHMAN: When will the plant go under construction? That would also be in June of 1971?

MR. HEALY: Yes.



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MR. KLASHMAN: June of 1971 the plant would start construction. And when would the plant be completed and in operation?

MR. HENCHEY: Our consultant has estimated that it would be 2 years in construction.

MR. KLASHMAN: So that would be --

MR. HENCHEY: June of 1973.

MR. KLASHMAN: That would be June of 1973?

MR. HEALY: Yes.

MR. KLASHMAN: Would that be June of 1973, Mr. Healy?

MR. HEALY: That would be the earliest possible date. I would rather look forward to completion by December of 1973 and give the city adequate time to contend with any other obstacles that might develop. This is not to create obstacles but, rather, to be more realistic as to the actual completion date.

MR. KLASHMAN: You don't think it is possible to have it done by June of 1973?

MR. HEALY: It is a possibility, but I think we are talking of commitments, and I would rather lean toward December of 1973 for completion.

MR. KLASHMAN: Do you have any comment on this, Mr. Casazza?



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MR. CASAZZA: No comment.

MR. HENCHEY: I would like to indicate that the city of Concord is willing to accelerate this or push it just as hard as they can, but there are many factors in all of this program which have been beyond our control. Those which are beyond our control leave us rather frustrated.

Frankly, we would have built a plant several years ago had it not been for the requirements of HHFA way back that we combine with another community. And you probably should be aware at this time, if you are not, that this one treatment plant in North Concord -- or the Penacook area so-called -- would take care of the sewage wastes from two communities, not just Concord alone.

We have made great effort to create a combined facility, to in essence be really efficient in the expenditures of money, and also to really clean up a great deal of both domestic and industrial wastes that will be a great improvement to the conditions of the Merrimack River when this plant is completed.

MR. KLASHMAN: What are those two other communities?

MR. HENCHEY: The two communities being the Penacook area of Concord and the town of Boscawen.

MR. KLASHMAN: The town of what?

MR. HENCHEY: Boscawen, New Hampshire.

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MR. KLASHMAN: In other words, you are --

MR. HENCHEY: This one treatment plant treats the disposal or the sewage from both areas.

MR. KLASHMAN: As I understand it, then, the completion date would be December of 1973, the firm date, and hopefully you would try to get it done by June of 1973? Is that right, Mr. Healy? The final date is December, but you hope that if possible you can put that possibly to June of 1973?

MR. HEALY: I'm sticking with December of 1973.

MR. KLASHMAN: But he was saying that they are hoping that they could get it done sooner. Is that correct?

MR. HENCHEY: We would make every effort to have it done as early as possible.

MR. HEALY: Right.

MR. HENCHEY: Frankly, we have not been able to meet many of the deadlines which we have established in the past, and it has not been because of the city of Concord that we have missed these deadlines.

MR. KLASHMAN: Mr. Healy, for the record, as I see it, since Boscawen is going to be connected to Concord, is there now an interceptor or will that be built within this time frame?

MR. HEALY: This is all built within the time frame.

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And, of course, there will have to be in-plant changes in industry. This is a plant that is combined to the extent that it will take care of industrial wastes as well as domestic sewage.

MR. KLASHMAN: But as to the dates for Boscawen, the plans are already completed I take it?

MR. HEALY: The plans are now in our office.

MR. KLASHMAN: For Boscawen?

MR. HEALY: For the entire project.

MR. KLASHMAN: And which includes Boscawen?

MR. HEALY: Correct.

MR. KLASHMAN: So that for Boscawen the appropriation of funds, the start of construction, and the facility being in operation would be identical to North Concord, or September 1970, June 1971 for the appropriation of funds, June 1971 for starting construction, and December 1973 for being in operation, the same as for North Concord?

MR. HEALY: Yes, they should coincide.

MR. KLASHMAN: What about the Brezner Tanning Company?

MR. HEALY: This is the industry that is involved here. It is the major source of industrial waste. It is a division of Allied.

MR. KLASHMAN: When will they have final plans and

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start construction for the interceptor?

MR. HEALY: They are tied into the city sewer system, and all of the design work --

MR. KLASHMAN: They are already tied in now?

MR. HEALY: Yes. All of the design work is being conducted by the city.

MR. KLASHMAN: But the connections to the city system are already made?

MR. HEALY: The connection already exists to the city sewer system, yes.

MR. FITZPATRICK: Is it correct the interceptor is built? Or is another interceptor going to be built?

MR. HEALY: No, no. There will be an interceptor on the Boscawen side of the river, and I think that there has to be a new interceptor system constructed on the Concord side of the river.

MR. FITZPATRICK: I have another question. I wonder is there also a Penacook Fibre Company?

MR. HEALY: Yes. Penacook Fibre is involved in this picture. Yes.

MR. FITZPATRICK: They are going to the North Concord primary plant?

MR. HEALY: Yes. It is a policy of the Commission and has been for several years -- and I think this is



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provided for in the Federal statute -- that whenever possible, whenever the wastes are compatible, when they can be subjected to treatment in the same treatment plant, then this is the objective that should be sought. And certainly this is a good case of it.

MR. KLASHMAN: Well, as to the dates then for the Penacook Fibre Company and the Brezner Tanning Company, are both now connected to the city sewer?

MR. HEALY: No, the Penacook Fibre Company discharges to the river.

MR. KLASHMAN: When will the plans be done for them to hook in? Or are they already completed?

MR. HEALY: This is all part of the one project.

MR. KLASHMAN: In other words, --

MR. HEALY: What I'm saying, in effect, is that the combination of industrial and domestic wastes from the Boscawen and the Penacook areas should be totally collected and under treatment no later than December of 1973.

MR. KLASHMAN: Then would it be fair to say for the industries that the plans were completed in September of 1970, that the construction for the treatment of these wastes will be June of 1971, and they will be fully treated by December of 1973? The Brezner Tanning Company is now discharging into the city system? The Penacook Fibre Company will be

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hooked into the city system by December of 1973 when the plant is done? And construction will start fundamentally around June of 1971?

MR. HEALY: That's right.

MR. FITZPATRICK: Mr. Chairman, may I ask Mr. Henchey a question? In terms of the North Concord plant, what proportion of the total waste do you feel would be industrial and what proportion would be domestic waste?

MR. HENCHEY: I don't have that figure available. I think a substantial part is residential, but I cannot give you a percentage breakdown.

MR. FITZPATRICK: In terms of the industries that are involved, the tanning company and the fibre company, is it proposed that they provide pretreatment at the industry before it is collected by the city and treated at the city plant?

MR. HENCHEY: I am only aware of the tanning company. Now, the tanning company recently has changed their process in order to cut down their volume. They are involved with pretreatment before it comes into our plant.

MR. FITZPATRICK: This is one of two plants in the city, and you probably have other industries that are going to be going into your Concord South plant. As far as the city is concerned, does the city have any criteria or any

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regulations in terms of pretreatment from industry? Or are they considering pretreatment regulations as far as industry is concerned?

MR. HENCHEY: The city itself does not have regulations. I think that we have required our industries, through working with the Commission, to meet standards. Mr. Healy can elaborate on this perhaps more than I can. I am not in a position to answer that proposal.

MR. KLASHMAN: The point that Mr. Fitzpatrick is trying to emphasize is that under current regulations, which were issued earlier this year, it is necessary that the community have a firm contract with the industry that they are going to serve to insure that the industry is paying both an equitable share of the capital costs and also of the maintenance and operation costs.

We are just trying to make sure that you are aware of this and that steps are being taken to meet these requirements.

MR. HENCHEY: I would like to say that the city of Concord is prepared to go into a rather comprehensive rate study in 1971, and I am sure that this study would take into consideration the Federal regulations. However, I have never received a copy of these regulations in my office, to my knowledge.

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MR. KLASHMAN: Mr. Healy, you may wish to make these available to the city. If you don't have copies, we will get some.

MR. HEALY: We will be very pleased to have them supplied. Mr. Henchey is correct. I don't think that Concord or even any of the other municipalities along this watershed are familiar with the new regulations. If anybody is, it would be a surprise to me, because they are of such recent origin.

I can say, in agreement with what Mr. Henchey has said, that the city now has the ability to adopt any ordinances or regulations, requirements that might be necessary to protect its system. It also by special statute several years ago was given the authority to develop rate schedules to provide a system of equitable charges for those individuals and industries connected to its system.

We already have a rental system in the city of Concord, and this will be expanded and altered in accordance with the new requirement after treatment is installed.

I would like to take this opportunity to add one small comment, although I think it is quite significant, with regard to our schedule. Earlier, before it was decided we would go forward with secondary treatment at this time, we had indicated that secondary treatment would not be



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completed in the city of Concord until December of 1975, but by coordinating the two programs, this result will be achieved two years earlier, by December of 1973.

I think this is an indication of the State's and the municipality's attitude to attempt to clean up conditions as rapidly as possible.

MR. KLASHMAN: The record will show this. Thank you for mentioning it.

Can we then say that in 1971 the city of Concord will have developed ordinances providing for equitable charges for industry being connected to their system?

MR. HENCHEY: All the proper information being available, yes.

MR. KLASHMAN: Yes. That you will meet whatever the Federal requirements are?

MR. HENCHEY: Yes.

MR. KLASHMAN: Thank you.

MR. HENCHEY: I hope you don't change them.

MR. KLASHMAN: Thank you for that comment.

I would like now to go on to South Concord. Could you tell us what your schedule is for that plant for secondary treatment?

MR. HENCHEY: At this point I have received authorization from the Concord City Council to enter into a

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contract, when it is approved by the Water Pollution Control Commission, as to scope, fee, and form. At this point we are merely waiting on the Commission for approval of this contract after it takes our needs into consideration.

With approval, I am prepared to sign this contract immediately, to enter into the phase of plans and specifications for the Central sewage treatment plant.

I would expect that these plants would probably take in the vicinity of 18 months to 2 years to complete, but there may be some conjecture on my part by trying to put a time limit on them.

MR. KLASHMAN: What would be the date of that?  
December 1971?

MR. HENCHEY: Well, the date is out of the hands of the city of Concord. When the State of New Hampshire Water Supply and Pollution Control Commission has approved a contract, I will sign it. If there is any date, it would come from the Commission and not from the city of Concord.

MR. KLASHMAN: Mr. Healy, could you comment?

MR. HEALY: We have agreed in our Water Quality Standards Commission to completion of this portion of the State's program by December of 1975. And what Mr. Henchey said is correct. He is now prepared to enter into an agreement with the engineer, and we shortly expect to have those

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discussions to negotiate the contract, whereupon the city will then move forward with plans and specifications.

But, looking at the picture realistically, it would be difficult indeed for the city to have both projects under construction at the same time. We would much rather move forward with the Penacook and Boscawen plant and have that well under way, toward completion, before we start construction on the Central treatment plant in the city proper.

We haven't discussed at this point any firm date with the city for the initiation of construction. We will have to get the plans finished.

MR. KLASHMAN: When will the plans be completed?

MR. HEALY: We have not talked with the city consultant yet, but I would expect that we will want a year to a year and a half for completion of the plant.

MR. KLASHMAN: The date that we had discussed before was December 1971, I believe. Is this --

MR. HEALY: For preliminary plans?

MR. FITZPATRICK: Have they completed the preliminary plans?

MR. HEALY: They have completed the preliminary plans. There may be some updating of it now, but they have had a preliminary plan by the same firm some years back.

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Mr. Klashman has furnished me with a copy of the schedule which we submitted. I don't have my own copy with me.

MR. KLASHMAN: The dates as --

MR. HEALY: The dates as we have indicated to you in our standard are:

Completion of the plans for the Central treatment plant, or Concord South, whichever way you designate it, by December of 1971. We will come pretty close to that date. I would say that we would stay with the December 1971 date.

MR. KLASHMAN: And the start of construction?

MR. HEALY: We will start construction actually in the spring of 1973, with completion by --

MR. KLASHMAN: So that would be April 1973 for construction? Is that right?

MR. HEALY: That is correct.

MR. KLASHMAN: And completion would be when?

MR. HEALY: December of 1975.

MR. KLASHMAN: When would the financing be completed on that?

MR. HEALY: One thing we have got to keep in mind here in all these comments is that we expect, as we stated earlier, the financing of obligations of the Federal government will keep pace with what the State is doing. We



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have a prefinancing law here, but I don't think it would be realistic for me to anticipate that the legislature is going to prefinance each and every project.

There has got to be an improvement, as far as I am concerned, in the Federal financing if we are to achieve the dates that we have suggested.

We do intend to prefinance the Concord North project -- the Boscawen-Penacook project. This will be undertaken with 90 percent State funds, 10 percent of local funds, and reimbursement later by the Federal government.

As I say -- and I emphasize -- we must have better results in terms of more adequate grants from the Federal level.

MR. KLASHMAN: But if the construction is going to start in April of 1973, certainly the financing has to be done by that date. So is that the date that you are --

MR. HEALY: This is what we anticipate, yes.

MR. KLASHMAN: You are figuring that the financing will be completed by, say, March of 1973?

MR. HEALY: Yes.

MR. KLASHMAN: Is that right?

MR. HEALY: Yes.

MR. KLASHMAN: Do I understand the preliminary plans on South Concord are already completed?

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MR. HEALY: They have a preliminary report, yes, covering that, and the treatment plant site is owned by the city? Correct?

MR. HENCHEY: Yes. We have purchased the treatment plant site several years ago. We complied with, I think, many of the basic requirements of this study, including some separation even at this point, in anticipation of eventual facilities.

MR. KLASHMAN: Thank you very much.

Mr. Peloquin, do you have any questions?

MR. PELOQUIN: No questions.

MR. KLASHMAN: Mr. Casazza?

MR. CASAZZA: No questions.

MR. HENCHEY: Could I say just one thing? Without financing available at at least a 90 percent level -- and we expect to be qualified for 95 percent total reimbursement -- but without this being available at the time a contract is to be let, this plant would not be built. We just couldn't do it.

MR. KLASHMAN: I think that it is important for the record to show, while we are sympathetic to this position, that the Federal government is expecting the plant to be built on this schedule. While we sympathize with you, we are holding to the schedule that we have been discussing

John Henchey  
Bernard Corson

here.

MR. HEALY: Just so again the record will be clear, and not to engage in any debate, the State of New Hampshire expects -- I am sure the other States expect -- that the Federal people, Congress and the agency, will have to be realistic.

This is not a one-way proposition. The basic and primary responsibility does rest with the States and municipalities and industries, but the Federal government has a big responsibility here. It is dollars. And they have to live up to it.

MR. KLASHMAN: Mr. Healy, whom would you like to call on next?

MR. HEALY: I would like to have Mr. Corson, Director of Fish and Game, given an opportunity to comment.

STATEMENT BY

BERNARD W. CORSON

DIRECTOR, FISH AND GAME DEPARTMENT

NEW HAMPSHIRE WATER SUPPLY AND POLLUTION CONTROL COMMISSION

MR. CORSON: My name is Bernard W. Corson.

Members of the Panel and Guests, I have no written statement. I just would like to make a few informal comments concerning the recreational fishing potential in

## Bernard Corson

the Merrimack watershed in behalf of some 200,000 sportsmen.

We don't have all the hay in the barn, so to speak, but I do feel that we have made some splendid progress.

We are engaged in a coordinated program of fisheries management for the Merrimack River basin which will require fish passage facilities in the cleanup work which is currently being carried on by the Water Supply and Pollution Control Commission. This program is designed to restore runs of American shad and Atlantic salmon to the Merrimack.

We have just, as a matter of interest, introduced shad in 1969 -- that is, shad eggs -- and again in 1970. My fishery staff indicate that we have had a good hatch. More recently, we have found some of the migrants or fish that have resulted from this hatch moving downstream.

I would also like to say that the Pemigewasset from Lincoln down, as a result of pollution abatement, is currently being managed by the New Hampshire Fish and Game Department. This provides 40 miles of additional stream that for many, many years has not supported sport fisheries. This is currently being managed for trout, and it has provided some excellent fishing opportunities during this past summer.

In summary, we feel that progress, good progress,



## Bernard Corson

is being made in the Merrimack River system so that it will realize its full potential recreational values.

I would be happy to answer any questions, Mr. Chairman.

MR. KLASHMAN: Mr. Casazza?

MR. CASAZZA: No questions.

MR. KLASHMAN: Mr. Healy?

MR. HEALY: No questions.

MR. KLASHMAN: Mr. Peloquin?

MR. PELOQUIN: No questions.

MR. KLASHMAN: Thank you very much.

Mr. Healy, whom would you like to call now?

MR. HEALY: We did not have any sequence of appearances here, but I noticed earlier that Mr. Howard Northridge, who is the chairman of the Manchester Highway Department, is here with some of his staff. I don't know whether he wants to make a statement or not. If he does, certainly we would like to hear from him.

MR. HOWARD NORTHRIDGE: No statement, Mr. Chairman.

MR. HEALY: Mr. Grogan, the city planner from Manchester, is here. I have spoken to him. He does not care to make a statement, but the record should show he did attend and was interested in the proceedings that are going on here.

## Edward Haseltine

Ed Haseltine, chairman of the Board of Selectmen at the time that Merrimack went ahead, is here. I think that is the project we referred to when we said one of our communities went ahead with a very large investment and pre-financed the project itself. He is from the town of Merrimack, as I say, and he certainly is welcome to make any comments he might want to make.

Do you care to make any statement, Ed?

## STATEMENT BY

EDWARD J. HASELTINE

SELECTMAN, TOWN OF MERRIMACK, NEW HAMPSHIRE

MR. HASELTINE: Mr. Chairman, the only statement I would like to make is I would like to support Mr. Healy's remarks about the necessity of the Federal government meeting its proportionate share of the programs.

We in Merrimack, which is a very small community, embarked upon a rather extensive program with the blessing of the Water Pollution Commission and their very helpful assistance, and we have constructed a \$6.5 million treatment facility to service a population of 8,000 people and an industrial complex which is growing daily.

We had to take the bull by the horns in order to secure some industry, and we did. Hopefully, we are going

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to have some participation. We have been assured of State participation. There has been some question about the Federal participation to the extent that it is desirable. We do need this. We have counted on it.

We floated \$10 million worth of bonds, on which we are having to support the debt service, in conjunction with the State, and it is a pretty big load on our shoulders.

The only one really major statement I would like to make is that I support Mr. Healy that the Federal government cannot expect small communities that are already overburdened with real estate tax burdens to support \$10 and \$20 million projects unless they get some industry help to support it.

We do have a going plant. It is a very exceptionally well operating plant at the moment. We do have ordinances and regulations to provide for our businesses that are participating in it. We think we are off the ground now. Give us some money, and we will continue.

Incidentally, we are going to continue another 6 miles of interceptor line to take care of our residential area. Hopefully, they are going to bid within a matter of 30 days. The plans, redesigned, are in the Water Pollution Commission right now and will be out, and we hope to go to bid within the month, Mr. Chairman.

## Edward Haseltine

I would be glad to answer any questions anybody wants to ask.

MR. KLASHMAN: Do I understand that Merrimack now has a plant in operation?

MR. HASELTINE: We do.

MR. KLASHMAN: Is that a secondary treatment plant?

MR. HASELTINE: Primary and secondary. Yes, sir. We would like to have you visit it.

MR. KLASHMAN: Thank you. I will.

MR. FITZPATRICK: Before you leave, sir, there are a number of industries in the Merrimack area. I assume the Busch brewery is in your plant. Are other industries in this plant as well, or are they not connected to it?

MR. HASELTINE: Yes, they are.

MR. FITZPATRICK: I refer to the New Hampshire Plating Company.

MR. HASELTINE: They are not connected yet, primarily because the interceptor line is going to be in the next phase of the contract which we hope is going to be bid within 30 days, and then we will have an interceptor line up to take care of their requirements.

MR. FITZPATRICK: I see. I would also raise the question of Merrimack Leather Company. Are they in your plant now?



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MR. HASELTINE: They are in our plans. They are not in it. The interceptor line is not up to their entrance.

MR. FITZPATRICK: Is this a single interceptor that you are referring to that will pick up both plants?

MR. HASELTINE: Yes.

MR. FITZPATRICK: Or are we talking about two different ones?

MR. HASELTINE: This is single. We are running our main interceptor lines from the treatment plant along 7.5 miles of the B & M Railroad right-of-way. This presumes to pick up any waste in that Merrimack Valley area, both industrial and residential waste.

MR. FITZPATRICK: I see. You say that this you expect to be bid within 30 days?

MR. HASELTINE: The second and third phases of the contract, which will involve the total expenditure of upwards of \$9 million-plus.

MR. FITZPATRICK: When would you feel, based on your present knowledge, that the interceptor would be completed?

MR. HASELTINE: As a minimum, 12 months from the date of bid; as a maximum, 18 months from the date of bid.

MR. FITZPATRICK: So that it would be sometime essentially between December of 1971 and June of 1972?

## Edward Haseltine

MR. HASELTINE: Between December of 1971 and July 1 of 1972, yes.

MR. FITZPATRICK: Is the New England Pole Company still operating in your area?

MR. HASELTINE: They are not.

MR. FITZPATRICK: They are not? They are out of business?

MR. HASELTINE: They are out of business as far as treating is concerned.

MR. KLASHMAN: As far as what? I'm sorry.

MR. HASELTINE: As far as the treating of material is concerned. They are not operating.

MR. HEALY: No discharge.

MR. HASELTINE: That is correct.

MR. FITZPATRICK: I have another question, sir. You mentioned domestic wastes as part of this new interceptor. What percentage would this be in relation to the domestic wastes you are now treating? 10 percent? 50 percent? Can you give me an idea?

MR. HASELTINE: Probably 10 percent.

MR. FITZPATRICK: About 10 percent?

MR. HASELTINE: Yes, when we get back with all of our collecting systems to come into this interceptor.

MR. FITZPATRICK: Referring to the two industries we

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mentioned, the New Hampshire Plating and the Merrimack Leather, when the interceptor is completed and these plants are brought into your municipal plant, will the town of Merrimack be requiring pretreatment from these plants?

MR. HASELTINE: At the present stage the answer is yes to that question. To what extent, or what participation the community will give to this, is not resolved at this point.

MR. FITZPATRICK: I have no more questions.

MR. KLASHMAN: Excuse me. Can I just review with you New Hampshire Plating and Merrimack Leather? You gave completion dates. Would you mind repeating them again? On the interceptor.

MR. HASELTINE: Okay. Assuming our plans are approved -- and they got over into Mr. Healy's shop last Thursday --

MR. KLASHMAN: In other words, the final plans for both New Hampshire Plating and Merrimack Leather -- that is, for the interceptors -- were completed October 1970?

MR. HASELTINE: The final plans presumably were delivered to Mr. Healy last Thursday.

MR. KLASHMAN: So they are completed now?

MR. HASELTINE: They are completed. This applies to the interceptor line only at the moment. It is

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anticipated that the two referenced industries will be tied into this sometime within the next 12 to 18 months.

MR. KLASHMAN: Then, what you are saying is that by October of 1971 they will be tied in? If they are going to be tied in, they have to do a little bit of design work, so you are saying that by October of 1971 they will actually be tied in?

MR. HASELTINE: This is our anticipated date.

MR. KLASHMAN: Well, would it be fair to say then that the construction on that has to start sometime prior to October of 1971? Have you any idea when we might figure that this might be, when that tie-in might actually start?

MR. HASELTINE: May I refer to Mr. Healy on this? This is a joint effort.

MR. HEALY: Right. Clarence Metcalf has left the room briefly, but he will be back, and I think he is in a better position than either one of us to advise you because he is handling the grant funds.

If we could hold that question until he comes back, we will get the answer.

MR. KLASHMAN: What I would like to know is when the plans will be completed and when the construction will start in order to meet the October 1971 date.

MR. HASELTINE: Mr. Klashman, I think you have to



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realize that these two industries are right adjacent to our interceptor line. I think the problems of tying them in are really minute. It is perhaps the design and pretreatment that may be required that will require some preplanning.

MR. KLASHMAN: Yes.

MR. HASELTINE: So I think, No. 1, they are going to be in our interceptor system -- period. We are going ahead.

MR. HEALY: And they will not be discharging until this connection is available.

MR. HASELTINE: That is correct.

MR. HEALY: That is the important thing.

MR. HASELTINE: That is correct. It might be beyond this 12-months date. Who knows what is going to happen in the construction industry?

MR. KLASHMAN: I understand. But, fundamentally, this is what you plan?

MR. HASELTINE: This is our projection.

MR. KLASHMAN: And Mr. Metcalf will give us a statement on when the plant will be done?

MR. HEALY: Right.

MR. KLASHMAN: Are there any other towns that you are planning to take care of in your plant?

MR. HASELTINE: It is rather difficult for somebody

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to speak for the residents of a community who are rather jealous of their dollars. There have been preliminary discussions, and very preliminary discussions, with the southern part of Bedford, New Hampshire, which is about where you are sitting. There are some problems here. I hesitate to say that for publication because this is contingent upon acceptance by the voters.

We do have a plant designed that will take care of -- with slight cost additions -- a residential population of approximately 200,000. You have to mix this with your industrial waste and where we can go. The capacities are unknown at this point.

MR. KLASHMAN: But Bedford is the only community?

MR. HASELTINE: That's correct, at the present time.

MR. KLASHMAN: Okay. Thank you very much.

Mr. Metcalf, you are going to furnish us these dates as soon as you can get them.

In the meantime, would you like to call on anybody else?

MR. HEALY: Yes. At this time, Mr. Chairman, we would like to ask City Engineer James F. Hogan from Nashua to make a statement. He has a prepared statement, and we would like to hear from him at this time.

James Hogan

STATEMENT BY

JAMES F. HOGAN

CITY ENGINEER

CITY OF NASHUA, NEW HAMPSHIRE

MR. HOGAN: I thank you for this opportunity to speak at the second session of the Federal-State conference in the matter of pollution of the waters of the Merrimack and Nashua Rivers.

I am James Hogan, City Engineer in Nashua, and on behalf of the city fathers and all the citizens there, I would like to make a progress report to the Federal government on our plans for ending pollution of the Nashua and Merrimack Rivers.

Secondly, I will try to describe to them our present dilemma, and, lastly, I would like to pose to them some questions that we have.

#### PROGRESS REPORT

Nashua has made every effort to stay on schedule with the State-required plan. Nashua is on schedule. And Nashua is, in fact, planning to do more than is required of them. However, achieving this measure of progress was not easy.

Our planning is completed, but it has taken quite

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a while. In December of 1967, our consulting engineers began to design the required primary treatment plant, intercepting sewers, and related stormwater separation facilities which are necessary to end Nashua's pollution of the Nashua and Merrimack Rivers. Although the estimated completion time for the design was 1 year, it was almost 3 years before the plans received the approval of the New Hampshire Water Supply and Pollution Control Commission. Their final approval of all 6 contracts making up our present depollution program was finally obtained on September 15, 1970.

The cost of our program is great, and it has increased substantially over the years. In October of 1966, our Board of Aldermen voted to raise, by general obligation bonds, a sum of \$3.4 million, under the assumption that the total project cost would be \$4.8 million. The city also decided at that time to spend, without the aid of the customary Federal loan, \$195,000 to pay for the engineering design.

Now that the plans and specifications have been completed, we find that, because of our earlier decision to plan for making the Nashua River cleaner than was required and because of construction cost inflation (now in the vicinity of 10 percent per year), the project cost is \$15 million and our engineering design cost is over \$536,000.



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We have paid the engineering fee without the aid of a government grant or loan, but the staggering proportions of the project cost leave us no decision but to seek a commitment of substantial financial assistance before beginning construction.

In November of 1969, the city of Nashua made formal application to the New Hampshire Water Supply and Pollution Control Commission for a Federal grant of \$7,860,000 to aid in the construction of the contemplated project. Some time afterward, the State Commission forwarded it to the Federal Water Pollution Control Administration (now FWQA) for their approval.

I might also add that, within the past year, because of significant construction along the interceptor route, Nashua has constructed voluntarily 2 portions of the planned interceptors, in order to keep down the cost of future construction, at a cost of approximately \$310,000, again with no Federal or State aid at this time.

Again, Nashua has more than done her share.

#### DILEMMA REPORT

As though the \$15 million price tag on her pollution abatement program was not problem enough, Nashua had a further bomb dropped on her plans. In January of 1970, after the FWPCA received our application for funds,

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they suggested a joint meeting of the New Hampshire Water Supply and Pollution Control Commission, themselves, and Nashua's consulting engineers, Camp, Dresser & McKee. This meeting was held in February 1970 and was attended by all the above and myself. At this meeting we were shocked to learn the following from the FWPCA:

1) The implementation schedule for the construction of the pollution abatement facilities must also include secondary treatment, and such secondary treatment must be constructed by December 1974 (the extra cost \$2.9 million).

2) The FWPCA does not give construction grants for combined sewers; and since a major portion of the city's initial construction program consists of combined **sewers**, then a major portion of the \$ 15 million program is not eligible for Federal aid. In order to make our proposed combined sewers eligible for Federal aid, the FWPCA suggested that the initial construction program be further expanded to include a stormwater retention basin (another additional cost of \$5.4 million).

3) Contrary to general belief, the Federal law requiring the abatement of pollution and the one promising 50 percent Federal aid are not companion laws, and the schedules for pollution abatement must be met by the local governments regardless of whether or not Federal or State aid

James Hogan

is given.

4) The State was advised to request FWPCA to return Nashua's \$7,860,000 grant application.

Financially speaking, as a result of the February 1970 meeting, Nashua was directed to carry out a formidable program of pollution abatement, one which would cost \$23.3 million -- \$8.3 million more than anticipated in November of 1969 and \$18.5 million more than anticipated in October 1966.

To further compound the problem, we were told that this program must be completed by December 1974.

And, lastly, as if to twist the dagger, the city was told that Nashua and the State of New Hampshire will have to finance it alone if Federal money is not available; and if State money is not available, then Nashua must finance it alone.

Recently, I have been led to believe that the government, because of the pleadings of our community and of many communities in similar circumstances, has now changed its ruling and that our combined sewers will be eligible for aid without the addition of any stormwater retention basins. However, I have no official word of this decision, and I have no choice but to discount such reports for the present. I would like an official verification or denial, however.

James Hogan

As of April 1970, Nashua's application for Federal aid, returned by FWQA to the State, lies dormant in Concord.

Our present dilemma is this: Why should we increase the scope and cost of our project when we know that Federal assistance is being given out in portions too small to fulfill the request? At the present level of funding, the whole State of New Hampshire receives only \$3 to \$4 million per year, and our latest application is for \$7.8 million.

It seems to me that from a financial point of view, if Federal funding is not to be increased, then our project ought to be diminished in scope from \$15.1 million, not increased to \$23.3 million or any amount above \$15.1 million.

With our latest application we have already "priced ourselves out of the market," so to speak, and we will be forced to stand idly by as smaller fundable projects receive New Hampshire's share of Federal and State aid.

My request is that you permit us to build our project in, if you will pardon the alliteration, fundable phases.

#### QUESTIONS

In addition to an answer to the preceding requests, Nashua is seeking the answers to other very pertinent questions:



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1) Is the Federal government going to impose military force or economic sanctions on the city if the deadlines are not met? If Nashua is forced to finance the project alone, we would be courting economic disaster.

Assuming that the project is financed entirely by Nashua through 20-year bonds, that the cost of construction continues to rise at 10 percent per year for the next 5 years, and that the rate of borrowing will average 6 percent, then the cost of the \$23.3 million project will spiral to an expenditure of over \$50 million in the next 24 years. This would cause the tax rate to increase by an average of approximately \$20 per thousand over the current \$85 per thousand. Is Nashua expected to commit itself to this financial program?

2) Will prefinancing by the State legislature be available? Indeed, should we, as citizens of New Hampshire, ask our legislators to make it available?

I fear that we presently have a situation where the Federal government is pointing to the States and saying, "You tax them more; we don't dare to," and the States are pointing to the Federal government saying, "No, you tax them; we don't dare either."

Our local government, in the final analysis, has to live with the problems that you gentlemen talk about, and

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our local government is not going to tax the people to build treatment facilities when the burden for schools (\$20 million in Nashua) and sewerage to newly developed areas (\$3 million in Nashua) and other pressing needs cannot even be financed.

We feel that the Federal government should not push the States and cities to action with their laws. Rather, they must lead the way -- with laws and with money.

3) Does the construction industry have the capability of building all the treatment works and interceptor sewers that the government is requiring in the next 4 years? Or will the great amount of construction and the relatively few eligible contractors drive prices further out of sight?

4) Does the civil-sanitary engineering profession have sufficient capability to respond to the program schedule? Will the cost of their services be driven beyond all estimates?

5) Can the bond market absorb the demands for the money required for this all-out program? Or will interest rates get prohibitive?

#### CONCLUSION

In conclusion, then, I say that Nashua is on schedule with a reasonable plan. We would like our government to concur in this plan and to either increase funding or let us build it in fundable phases.

James Hogan

Thank you.

MR. KLASHMAN: Are there any questions?

Mr. Casazza?

MR. CASAZZA: No questions.

MR. KLASHMAN: Mr. Healy?

MR. HEALY: No questions.

MR. KLASHMAN: Mr. Peloquin?

MR. PELOQUIN: No questions.

MR. KLASHMAN: Mr. Fitzpatrick?

MR. FITZPATRICK: Yes. I have several questions I would like to raise.

We are not certain on whether or not the community of Hudson is going to be with your plant in Nashua in the future or not. Do you have any knowledge of this?

MR. HOGAN: Yes. The plant and the interceptor which would sewer Hudson have the capacity to sewer Hudson. The Nashua fathers are on record as being agreeable to taking Hudson subject to a suitable instrument of agreement. That is the stage where we are now.

We have not, in other words, made a formal agreement to take them in. And, of course, we have no such plant that would take them in.

MR. FITZPATRICK: At the present time at Nashua you have a primary plant which handles a portion of the city?

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Is that correct?

MR. HOGAN: That is correct. We also have a sewage lagoon which gives secondary treatment to another substantial portion of the city.

MR. FITZPATRICK: In terms of the primary plant initially, in your plan for the future, is this going to be upgraded to secondary treatment? Or how is this going to be done?

MR. HOGAN: As I stated in my remarks, we do not have primary or secondary treatment in the present plants. It is, however, anticipated in the general planning for the project that it would be scheduled for approximately 1975.

MR. FITZPATRICK: I didn't hear that.

MR. HOGAN: 1975.

MR. KLASHMAN: You mean that is the date when the secondary plant will be in operation?

MR. HOGAN: At best, yes. As I have stated in my remarks, we do not have plans for secondary treatment, and we are at a stage now where we are trying to review the application, and we would hopefully like to phase secondary treatment. We are not able to finance even primary treatment. It does not make too much sense to design a plant for secondary treatment and then watch the plant get stale and equipment go out of date.



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MR. FITZPATRICK: In terms of --

MR. HOGAN: These are my own personal feelings, incidentally. They do not reflect the considered approach of the city fathers, although I suspect they would concur.

MR. FITZPATRICK: In terms of the lagoon, the city plans to continue with this into the foreseeable future? Or is it going to be replaced?

MR. HOGAN: It would be replaced under the scheme which we are proposing for the interceptor system. The interceptor would bring it down to the new plant.

MR. FITZPATRICK: Then you would phase out the lagoon in terms of your present plan?

MR. HOGAN: Yes, sir.

MR. FITZPATRICK: In terms of the industries which are in Nashua -- and I refer to some of these, Sanders Associates, Johns Manville, Ferrersflex Company, Brown, Granite State Tanning Corporation, Sprague Electric, and Hampshire Chemical -- do any of these insofar as you know have treatment at the present time? And do you plan to pick up any of these in the city?

In other words, are these going to be connected to the city system at some time?

MR. HOGAN: I can't give a yes or no answer to them as a group because they are all in a different status. If

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you will give them to me one at a time, I will give you an answer.

MR. FITZPATRICK: I will start with Sanders Associates.

MR. HOGAN: Sanders Associates is in two general locations. One is presently sewered to the treatment plant. The second location is not sewered, and the interceptor will be located sufficiently close to them so that they can pump into it.

MR. FITZPATRICK: What is the present schedule in terms of when this interceptor will be, first of all, completed?

MR. HOGAN: Again, it is on schedule. The plans are complete both for the interceptor and for the treatment facility to which it will lead, and we are awaiting Federal funds.

MR. FITZPATRICK: Assuming these things, what is the date that you feel that this --

MR. HOGAN: Assuming they are available, we will begin tomorrow. We will advertise. The plans are complete. The specifications are complete.

The application has not been forwarded. It is a record assumption.

MR. FITZPATRICK: When were the plans for the

James Hogan

interceptor completed?

MR. HOGAN: When were they completed?

MR. FITZPATRICK: Yes. Is it the date of September 15, 1970 that you quoted?

MR. HOGAN: This was the time they were fully completed, when any last changes by the Commission were made.

MR. KLASHMAN: What was that date again, please?

MR. HOGAN: September 15, 1970 was the final approval or the final contract by the Water Supply and Pollution Control Commission.

MR. KLASHMAN: The plans were completed September 1970?

MR. HOGAN: Well, the plans received their approval from the Water Supply and Pollution Control Commission on September 15, 1970.

MR. KLASHMAN: What industries did that cover? He was going down the list. Is that the same interceptor or are they different interceptors?

MR. HOGAN: There are a number of different interceptors.

MR. KLASHMAN: But for Sanders Associates, September 1970 was when the plans were completed?

MR. HOGAN: Yes, sir. It would pick up part of the facilities.

James Hogan

MR. FITZPATRICK: I'm not sure I understand the other dates that we are concerned about in terms of Sanders Associates, and they are being picked up on this particular interceptor. I refer to the dates you propose to start construction and when you feel that they will be in the system -- in other words, when the interceptor system will be completed and wastes will be going into it.

MR. HOGAN: The date we start this program again is contingent on Federal grants. It is as simple as that. And were I to give you any other answer I would be talking without any kind of authorization from anybody.

MR. KLASHMAN: Mr. Healy, have you any idea when this is scheduled in your program?

MR. HEALY: Our schedule would indicate completion of Nashua's program by 1974. But, as Mr. Hogan indicated and as I reiterated earlier, all of our schedules have been developed with anticipation of adequate Federal grant funds. In the absence of this, the only other area we can turn to -- because the municipalities have their other obligations to contend with -- is the legislature to prefinance in the absence of adequate Federal funding. But this can also lead to difficulty.

We have to expect that the Federal government will be more liberal. They are enforcing these deadlines. They



must take care of their obligations financially.

MR. KLASHMAN: With the financing at the billion dollar level, which it appears will be the financing for this year, assuming that this continues, when would the construction actually start on this interceptor? Do you have any comments on this?

MR. HEALY: Mr. Metcalf feels he can answer that question.

MR. CLARENCE W. METCALF (Director, Municipal Services, New Hampshire Water Supply and Pollution Control Commission): A billion dollars sounds like a lot of money. But right now we have a little over \$10 million of eligible work already in progress, some of it completed, with no Federal funds to reimburse these towns and cities.

So, in short, let's say this: The Federal government is in hock to the State of New Hampshire for \$10 million for projects which have already, as I say, been completed or are under way.

I don't wish in any way to keep Nashua from going ahead. Mr. Hogan has been trying to move this project. We would like to see them at least get a partial grant so, as he indicated, they could start a phase of it and get their money.

But the \$3.5 or \$4 million out of the billion

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dollars will not go very far.

MR. HEALY: There is one other source of funds, and it is the Federal funding program under the New England Regional Commission. I think you are aware of the demonstration projects on the Nashua River between the States of Massachusetts and New Hampshire. This may help to provide some area of funding that is not now available under the regular FWQA program.

But, again, I have to repeat that we do need to be more realistic at the Federal level, I believe, in funding the obligations facing us.

MR. KLASHMAN: Mr. Healy, with the December 1974 completion date for all of Nashua's program, what I am trying to find out is when you anticipate -- assuming that these Federal programs go ahead, which is what you are assuming -- the construction would actually start on these projects.

As I understand it, you were talking about Sanders.

MR. HEALY: Sanders. Yes, sir.

MR. KLASHMAN: When would it --

MR. HEALY: Can you answer these questions, Jim?

MR. HOGAN: I would guess I could. The status of the project is that it is completely designed. Were Federal funding made available -- assuming that you will let us submit it to you in its current phase, that is, which does

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not at the moment include secondary treatment, nor does it include a retention chamber -- then we are prepared to go ahead with this phase. I mean, in other words, primary treatment and the interceptors. This way it is only the formal application and the approval of the Federal government before we could proceed to advertise for bids.

So I guess making all those assumptions we could say in the spring.

MR. KLASHMAN: Mr. Hogan, I think you asked some questions. I will just digress for a moment. I don't know whether you expected answers.

MR. HOGAN: They were rhetorical for the moment, --

MR. KLASHMAN: They were rhetorical?

MR. HOGAN: -- if you would answer them at your leisure.

MR. KLASHMAN: Then I won't go into answering those here.

I would just like to make one observation. That is, the Federal law, the Federal Water Pollution Control Act, is very specific in calling for the construction and giving aid for the construction of waste treatment facilities. When we go in for the interceptors, it has to be for interceptors that are carrying wastes that will be treated.

If a project is proposed which is going to handle

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stormwater rather than sanitary wastes and industrial wastes or municipal wastes, the law does not permit us to participate in such a project.

In the case of a combined sewer where there is a situation where there is no other way at this moment of handling these wastes except in a combined sewer, it then becomes necessary to provide some treatment for that waste. And there has to be some type of a commitment made that, if the treatment device is not going to be built currently with the construction of the interceptor, it has to be scheduled and built immediately thereafter.

In other words, it has to be scheduled, and we have to have firm dates on this.

I think this is the place where there seems to have been some misunderstanding here on your part. Because we simply don't have the authority to approve any project that is for an interceptor which is not going to go to a treatment plant -- and is not going to go to a treatment plant that provides under the law what is called adequate treatment. The law just doesn't provide this.

We didn't write the law. This was written by the Congress of the United States. We are merely carrying out their mandate.

So, on this question of these interceptors, we



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have to have some firm schedules from you, as I understand it, of when you are going to do whatever is required.

MR. HOGAN: Can these schedules again be contingent on Federal funding?

MR. KLASHMAN: No, I don't think they can be.

MR. HOGAN: Then you must see my position.

MR. KLASHMAN: Yes, I understand your position, but the point is they cannot be conditioned. And I think this would best be discussed a little bit. Apparently it has not been discussed fully enough and will have to be discussed further.

MR. HOGAN: Yes. I wouldn't try to discuss it at this time.

MR. KLASHMAN: I would like it, however, if we could go down this list, Mr. Hogan.

First, on Sanders Associates, you say there are two plants. One of them is connected already to the sewer. Where is it located?

MR. HOGAN: It is located in the southern end of town. It is a fairly new plant, about 3 to 4 years old.

MR. KLASHMAN: We can refer to it then as the south end plant?

MR. HOGAN: Yes, sir.

MR. KLASHMAN: Where is the other one located?

James Hogan

MR. HOGAN: The other one is located on Canal Street.

MR. KLASHMAN: The Canal Street plant is not now connected to sewers?

MR. HOGAN: That is correct.

MR. KLASHMAN: But the plans were completed approximately September 1970 and the financing and start-of-construction dates are still not set?

MR. HOGAN: That is correct.

MR. KLASHMAN: We will go into this with you further, Mr. Healy, if we may, later.

What about Johns Manville?

MR. HOGAN: Johns Manville is located not too far from the Sanders plant on Canal Street, and that is in the same status as the Canal Street plant of Sanders.

MR. KLASHMAN: In other words, the plans and specifications are already done?

MR. HOGAN: Yes, sir.

MR. KLASHMAN: What about Ferrersflex?

MR. HOGAN: The same answer on Ferrersflex. Actually, that is pretty much similar to Sanders. A lot of their operations move to the south end of town also, and their operation there also has been picked up in the interceptor.

MR. KLASHMAN: You mean they are already connected to the sewer?

## James Hogan

MR. HOGAN: A good percentage of their operations. They move around town, you know. They move from the unsewered part to the sewer part.

MR. KLASHMAN: Well, again, --

MR. HOGAN: It is a two-part answer I have to give you, in other words.

MR. KLASHMAN: Do I understand they have two plants?

MR. HOGAN: Yes, sir -- at my last knowledge.

MR. KLASHMAN: All right. The south end plant is connected to the sewer?

MR. HOGAN: Yes, sir.

MR. KLASHMAN: And the other plant is located where?

MR. HOGAN: On Pine Street extension.

MR. KLASHMAN: Would you repeat that, please?

MR. HOGAN: Yes, sir. Pine Street extension.

MR. KLASHMAN: When will the interceptor be done for the Pine Street extension plant? When will the plans and specifications be done for that?

MR. HOGAN: The answer is the same as for the others. In September they were finished. In September of 1970.

MR. KLASHMAN: Is it the same interceptor? Or is it a different one?

MR. HOGAN: Well, it is a huge complex of interceptors, and it is that same group.

James Hogan

MR. KLASHMAN: What about the Brown Products Company?

MR. HOGAN: You know, so help me, I don't even know where that is. I suppose it's in Mill Yard, which would give us the same answer as Ferrersflex.

MR. HEALY: Yes, it is.

MR. HOGAN: Mr. Healy says it is.

MR. KLASHMAN: So plans and specifications were done in 1970.

What about Granite State Tanning Corporation?

MR. HOGAN: The present design has it that they will be picked up in the interceptor which was designed in 1970. I have some personal feelings on that which I won't get into at the moment, however.

MR. KLASHMAN: The Sprague Electric Company.

MR. HOGAN: The Sprague Electric Company, same answer as Brown Company. This was 1970.

MR. KLASHMAN: And the Hampshire Chemical?

MR. HOGAN: Hampshire Chemical is located in the south end of town. The domestic sewage is put into the interceptor and is treated at our treatment plant. Their industrial waste is treated on site, and no plan is anticipated to treat it municipally.

MR. KLASHMAN: For the Hampshire Chemical Company,



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as I understand it, currently their domestic wastes are going to the primary treatment plant? Their chemical wastes are being treated --

MR. HEALY: On site.

MR. KLASHMAN: Yes. Is this treatment meeting the-- By the way, when did their domestic wastes hook into the sewers?

MR. HOGAN: I think pretty much at the time that the interceptor was put in, and I believe that was 1968.

I beg your pardon. That was 1964 or 1962.

MR. METCALF: Finally about 1966.

MR. HOGAN: 1966.

MR. KLASHMAN: Is the industrial waste plant adequate, Mr. Healy, or do they have to do some extra work?

MR. HEALY: So far as I am aware, it is acceptable.

MR. KLASHMAN: Mr. Fitzpatrick, do we have any knowledge of this particular plant?

MR. FITZPATRICK: We understand they have treatment.

MR. KLASHMAN: Then, in effect, what you have said, as I understand it, is for all the industries the plans were completed for interceptors that will serve these industries in September of 1970?

MR. HOGAN: Yes, sir.

James Hogan

MR. KLASHMAN: And according to you, Mr. Healy, the date when these interceptors will be completed is December 1974?

MR. HEALY: This is what our records indicate.

MR. KLASHMAN: So the dates we do not have then are the dates when the financing will be completed and when the construction will start for these interceptors and when they will actually hook up. And if we could --

MR. HEALY: Well, again, you are getting back to the question of financing. Everything revolves around financing. As has been pointed out here several times, we haven't had adequate Federal financing. Since everything is contingent upon it, I think we have to face the basic issue of when the finances are going to be straightened out.

Mr. Palazzi has arrived, and he may want to comment on the State's view of this matter. But my understanding of it is clearly this: We do -- we definitely do -- incorporate the Federal grants in our program. In other words, we do not expect that the work can be achieved by the State and by its municipalities unless the Federal shares are available.

MR. KLASHMAN: Again, Mr. Healy, assuming that --

MR. HEALY: I know this is contrary to your view, but this is ours.

James Hogan

MR. KLASHMAN: Assuming that the Federal aid goes at the level it is going now, when do you anticipate that construction will actually start on this?

MR. HEALY: All that I would say to that is we would like to see your problems resolved and then maybe we could be more open in our commitments.

MR. KLASHMAN: Well, assuming that you get the level of funding that you are getting now, when would --

MR. HEALY: It would be a period of several years at the present rate of funding. I would be glad to furnish you with this answer -- or attempt to. I can't do it at this moment because we have other obligations that have to be fitted into the picture.

We are getting a little better than \$3 million a year of grant funds. As Mr. Metcalf pointed out, this has been totally inadequate for us to undertake present obligations.

MR. HOGAN: Could I state that, if I am correct, the total cost of New Hampshire's problem is \$168 million, as was published in the New Hampshire Municipal Association's booklet. If construction costs continue to rise at 10 percent, the costs of our projects will rise \$16.8 million per year, and the Federal grants won't even keep up with the construction rise. So we will go backwards.

James Hogan

MR. HEALY: This was one of the reasons, Mr. Hogan, that I think we were successful in a modest way in getting some prefinancing. Members of the General Court session were impressed that the rise in costs would more than use up any savings that might be accrued by waiting.

MR. KLASHMAN: Could I ask a question? Does the interceptor that was designed to handle these industries handle municipal wastes too -- I mean domestic wastes too -- or does it just handle industrial wastes?

MR. HOGAN: Municipal and industrial wastes.

MR. KLASHMAN: What percentage is industrial?

MR. HOGAN: I can't answer that.

MR. KLASHMAN: Is it half?

MR. HOGAN: I am sure it is not.

MR. KLASHMAN: It is less than half?

MR. HOGAN: I would guess so.

MR. KLASHMAN: Mr. Healy, can we say that we will get from you these other dates within the next 30 days?

MR. HEALY: Well, now, which dates are we speaking of?

MR. KLASHMAN: I'm talking about the start-of-construction dates. We have a final date as I understand it of December 1974.

MR. HEALY: This will all be predicated upon



James Hogan  
John Palazzi

Federal financing.

MR. KLASHMAN: This I understand.

MR. HEALY: Okay.

MR. KLASHMAN: Thank you very much, Mr. Hogan.

MR. HOGAN: Thank you.

MR. KLASHMAN: Mr. Healy has indicated he will  
furnish us these interim dates within the next 30 days.

Mr. Palazzi, would you care to join us?

STATEMENT BY

JOHN PALAZZI

CHAIRMAN, NEW HAMPSHIRE WATER SUPPLY AND POLLUTION CONTROL  
COMMISSION

MR. PALAZZI: Clarence is doing a much better job,  
and he is much better looking and younger. (Laughter)

MR. KLASHMAN: We welcome you.

MR. PALAZZI: I am sorry I am late. It was un-  
avoidable I assure you.

MR. KLASHMAN: Mr. Palazzi, would you care to say  
anything now that you have arrived? Mr. Healy read the  
statement.

MR. PALAZZI: Mr. Klashman, Mr. Fitzpatrick, Mr.  
Peloquin --

MR. KLASHMAN: Excuse me, Mr. Palazzi. Would you

John Palazzi

like to give your title for the record?

MR. PALAZZI: My name is John Palazzi, Chairman of the Water Supply and Pollution Control Commission.

I'm sorry I am late, as I said.

Mr. Klashman, Mr. Fitzpatrick, Mr. Peloquin, Mr. Healy, Mr. Casazza, Mr. Metcalf, there isn't anybody in this room who would like to see the waters of New Hampshire cleaned up immediately more than I. And I would push a button and have them cleaned tomorrow morning, or even tonight, if that were possible.

However, you have heard here that the cost of cleaning up the waters of New Hampshire is in the vicinity of \$200 million. If the Federal government comes through with their usual \$3 to \$3-1/4 million a year to us, you can see that it is going to take us 30 years, simply figuring to take care of their part, which would be in the vicinity of \$100 million. You don't want to wait that long. I don't want to wait that long.

So if we are going to get the job done, we have to come up with another system here. At the present level of government financing, it is just not going to get done in the time limit that you are setting and that we are setting.

We can come to these conferences and tell you we are going to get it done in 1970 or 1971 and everybody leaves

John Palazzi

happily. Then 5 years from now the job isn't done. And we can blame it on the engineers, we can blame it on the contractors, we can blame it on anybody we want, but the waters aren't going to be cleaned unless we get the funds.

Now, New Hampshire over the years has done a terrific job, in my estimation, with what we have had to do with. We haven't been "Johnny-come-latelies." We haven't been a State that has dragged its feet.

We started in 1947 to do this job, and we have been continually improving ever since.

Right now, as Mr. Metcalf has stated, the Federal government is \$10 million in debt to us. If we take our \$3 million a year or just a little over \$3 million a year, you can see that it is going to take 3 years to catch up on that.

I cannot in good conscience go back to the legislature and ask for prefinancing of further projects unless the Federal government is willing to pick up the interest charge. When the Federal government is willing to pick up the interest charge, yes, I will definitely go back and do the best I can to sell them on the prefinancing concept.

In my estimation, the only way we can get this job done is to pattern it after the highway program, the interstate highway program, of which I have some knowledge.

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Then the job will get done.

But until we come up with a similar system, the job is going to drag on and on and on. And unless we get caught up with the rising expansion in the population growth in the United States, we are not going to be doing the job that the public wants us to do and is willing to pay for.

Thank you.

MR. KLASHMAN: Thank you very much, Mr. Palazzi.

Mr. Healy, before we leave Nashua, I wonder if you could tell me if there is any plan for Hudson to hook up to Nashua or will they be handling their own wastes?

MR. HEALY: Clarence?

MR. METCALF: I think City Engineer Hogan explained it very adequately as far as the city of Nashua is concerned. They are not only willing but, if Hudson does decide to come in with Nashua, they will make an agreement with the town of Hudson.

I have met with Hudson officials from time to time. The fact is now they don't know what they want to do. They are undecided whether they want their own treatment plant or whether they would like to go in with Nashua. That's as much as I can say.

There may be some decision arrived at very soon, but right now no one knows exactly when.



## Questions and Answers

MR. KLASHMAN: As I understand it, in the standards they are scheduled for September of 1972. Do I understand that there is no preliminary plan, no date for final plans, and so on?

MR. METCALF: Preliminary plans have been completed.

MR. KLASHMAN: Do you know when those were done?

MR. METCALF: At least a year ago. I don't know the exact date.

MR. KLASHMAN: They were completed before October 1969?

MR. METCALF: Oh, yes, they were. They have a contract now for final plans. The stage of the completion is not set, but there is a contract between the engineering firm and the town to complete that final plan.

MR. KLASHMAN: Could we get the other dates from you again in the next 30 days?

MR. METCALF: Yes.

MR. FITZPATRICK: Clarence, were the preliminary plans based on Hudson going with Nashua or constructing their own plant?

MR. METCALF: It was speculation. Either way.

MR. FITZPATRICK: It was set up either way? I see.

MR. KLASHMAN: But they are now in the process of firming up a contract with a consultant to do the final plans

## Questions and Answers

and we will get these dates from you within the next 30 days?

MR. METCALF: You will.

MR. KLASHMAN: What about the Franconia Paper Company?

(Consultation among conferees)

MR. KLASHMAN: Since I have asked the question, do you want to answer the question?

MR. HEALY: Franconia Paper Corporation is in Lincoln. There is a treatment plant there taking care of industrial wastes, and there is another phase of the program which provides for treatment of domestic flows.

At this moment the industry is not operating. The facilities are there, and we understand that negotiations and discussions are under way with a view to reopening the plant.

MR. KLASHMAN: So the plant is completed and not in operation?

MR. HEALY: The plant is completed and available for operation, yes.

MR. KLASHMAN: What about the domestic wastes from Lincoln? Are those --

MR. HEALY: Those are all under treatment.

MR. KLASHMAN: Thank you.

MR. PELOQUIN: I have been hearing conflicting

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Howard Northridge

reports on Franconia. The paper production itself is closed down? Is that right?

MR. HEALY: The plant itself is shut down, Al. There isn't any production as far as I am aware. There may be a skeleton force to just keep the plant operable, but there is no production at this time.

MR. PELOQUIN: Thank you.

MR. KLASHMAN: Mr. Healy, do you want to call on somebody else?

MR. HEALY: Yes, I did. While we were hearing from Mr. Hogan, Howard Northridge, Chairman of the Manchester Highway Commission, has indicated he might want to make a few statements.

Mr. Northridge.

STATEMENT BY  
HOWARD NORTHRIDGE  
CHAIRMAN, MANCHESTER HIGHWAY DEPARTMENT  
MANCHESTER, NEW HAMPSHIRE

MR. NORTHRIDGE: Mr. Chairman and Distinguished Members at the Rostrum, for the record I would like to make the statement that the fact that Manchester did take the prerogative of not making a statement this morning does not portray that we are not interested in the cleanup of the

## Howard Northridge

Merrimack basin. We are. Every citizen, every elected official, and every appointed official in Manchester does evince such an interest.

However, I would like to point out several of the problems that have been presented here today by other large communities are prevalent in Manchester.

Three previous administrations have evinced the fact that they were not prepared to prefinance.

I am particularly pleased to hear John Palazzi make the statement here this morning that, insofar as these dates are concerned, perhaps they can't be met and perhaps the Federal government is imposing too great a job on them to see that these dates are met.

Right at the present moment the contract between the consultant and the city is yet to be signed. It is in the process of being signed. We hope that this would culminate at an early date.

But I think one of the things that might change this whole situation is again a suggestion that John Palazzi has made here this morning. If the Federal government would pick up the interest charges on this bonded indebtedness that these communities are going to have, I think perhaps that might create a different picture.

Mr. Klashman, you have pointed out that you are



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regulated by actions of the Congress. I would like to point out to you that city officials are regulated by mayors and boards of aldermen and councils. We are under the same restrictions as you. We can't take steps until they so determine.

I want to thank you for your time.

I would appreciate it if I am not subjected to questions. However, if you want to ask them, I will be pleased to do my best to answer whatever questions you have.

MR. KLASHMAN: There are some questions we would like to ask.

MR. NORTHRIDGE: Go ahead.

MR. KLASHMAN: If when we ask the questions you feel unable to answer or you prefer not to answer, we will understand.

MR. NORTHRIDGE: Go ahead. I won't crawl in any holes.

MR. KLASHMAN: First, on the preliminary plans for Manchester for both the primary and the secondary plant, I understand those are completed. Do you know when those were done?

MR. NORTHRIDGE: Preliminary plans I think were submitted to the State Commission 2-1/2 years ago. I don't know whether Mr. Reen has left. Is that not so? And to the

best of my knowledge they have yet to be approved by the State Commission.

MR. HEALY: No, that is not really correct.

MR. NORTHRIDGE: Am I correct in that statement?

MR. B. M. REEN (Chief Engineer, Manchester Highway Department, Manchester, New Hampshire): Preliminary plans have been furnished to the State.

MR. NORTHRIDGE: They have been furnished but not approved.

MR. HEALY: If I could review a little of the history here, the initial preliminary report based upon primary treatment was undertaken by one engineering firm. Subsequently, a second firm was brought into the picture, and they were to undertake final plans for that primary treatment system along with the collection facilities.

About that time, the Federal law was changed, and its policies, whereby secondary treatment would be required. This factor introduced some difficulty in a sense because the city then, taking note of this development, and the State, had to consult with the engineer in an effort to reorient the work to adjust to this schedule. In the process, the preliminary report had to be updated by the consultant now working for the city.

This he did, in consultation with us, and my

Howard Northridge

understanding is there is agreement as to the technical aspects of it.

We never have, unfortunately, been able to agree on what the additional work is worth. We have a figure; the consultant has another figure.

Now, the consultant has also proceeded with the work on the final plans and specifications for this initial project by the city to collect its sewage and industrial wastes and treat them, and this is what Mr. Northridge is referring to now when he says that shortly they expect to proceed with the engineer in this agreement with a change in scope, and the necessary fee in accordance with it, whereby the work will be completed and we will be able to go forward with construction.

But I think I am correct in stating that there is no difference of opinion about the work which was done. We know that it is acceptable with regard to the updating of the preliminary engineering report.

MR. KLASHMAN: Mr. Healy, I understand the date the plant is supposed to be completed is December 1973, for the secondary plant.

MR. HEALY: Sorry. For the primary plant.

MR. KLASHMAN: Yes. December 1973.

MR. HEALY: Right.

## Howard Northridge

MR. KLASHMAN: For the secondary plant, December 1975.

MR. HEALY: Yes.

MR. KLASHMAN: And for the interceptors it is also December 1975.

Do you have any interim dates? Or would you prefer to furnish those to us within the next 30 days?

MR. HEALY: We have furnished dates. As far as the primary treatment plant, rather than confuse the picture, I would start with construction, the initiation of construction, and completion of the facility. I think this would be more understandable by the folks gathered here and listening.

So we would start construction of the primary system and the basic interceptor by April of 1972 and complete that phase of the work by December of 1973, a period of approximately a year and a half or year and three-quarters.

The city would then proceed -- because it has a vast interceptor system to build here -- with the construction of its interceptor facilities, and this would go ahead on an orderly schedule right after completion of the initial phase. That would be finished by 1975.

Likewise, the secondary facilities would be initiated in this period of time and also be finished at the same time, December of 1975.



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These are the dates that we have.

MR. KLASHMAN: When would the construction start?

MR. HEALY: Of the interceptors?

MR. KLASHMAN: Yes.

MR. HEALY: In April of 1973, and would be finished in December 1975.

MR. KLASHMAN: And the secondary plant would be --

MR. HEALY: The secondary would start construction in April of 1974 and finish by December of 1975.

MR. KLASHMAN: As I understand it, the preliminary plans for the primary and secondary plants would both be completed by when?

MR. HEALY: The primary plans would be finished by November of 1971, which is approximately a year from now. The interceptor plans would be finished by December of 1972, about a year later. The secondary treatment facility plans for it would be finished by November of 1971.

MR. KLASHMAN: Let's take a 3-minute break.

(Whereupon, a recess was taken.)

MR. KLASHMAN: Please come to order.

Mr. Healy, on Manchester, on the financing, do you have dates on that or would you prefer to furnish that to us?

MR. HEALY: I would prefer, Mr. Klashman, to have some period of time, say 30 days, to discuss these various



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dates with the city and furnish them to you.

MR. KLASHMAN: Okay.

Under Manchester there is a series of industries.

I will just run through them quickly;

Manchester State Industrial School.

The Waumbec Mills.

Stevens Spin Company.

Seal Tanning Company.

M. Schwer Realty.

M.K.M. Knitting Company.

Manchester Hosiery Company.

Granite State Packing Company.

Foster Grant Company.

Do you have the dates available for them?

MR. HEALY: No, we don't have dates. I can tell you the philosophy is to take these industries into the system and relieve the industry of any necessity for treating independently.

Now, this means, of course, that the industry would have to bear its fair share of the cost. The one exception to that is the tannery. I am not sure that the tannery will come into the system.

Possibly the city would want to comment further on this.

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MR. NORTHRIDGE: Not being an engineer, Mr. Healy, I possibly cannot make comments as to industries that would introduce obnoxious conditions into the treatment plant. That would have to be determined at a later date after an engineering study is made on it.

One thing I would like to comment upon, insofar as these dates are concerned, is they are not city commitments.

I would also like to say this, Mr. Klashman: Insofar as the city and the State Water Supply and Pollution Control Commission are concerned, we probably have our arguments, and I don't think this is the time to wash our linens, as you might say. But eventually the State and Manchester have always come to an amicable agreement, and I think that that condition would exist in the future.

You will agree to that, won't you, Mr. Healy?

MR. HEALY: It covers a broad territory. (Laughter)

I think what you say is true, generally, that we may knock heads together on occasion, but we do have to resolve these problems, and I think we both recognize it. It may take time, but we get there finally.

I would have to say this though with regard to these dates: In order to continue to receive program and construction grants and to comply with the Federal statute,

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the State did have the obligation of furnishing dates. You may consider them to be target dates, particularly with the problem of financing in mind. But we have to furnish them, and we have to do it on our best judgment, and these are the dates that we have furnished.

There has been some pressure brought to bear on us by the Federal authorities to make the time as short as possible. Actually, this is our objective too, because everyone knows that the costs go up, so the sooner you get it done, the better off you are.

I think I am saying by indirection here that the State has had to furnish the dates on behalf of the city because the city has to work with the State. We have to join hands here. And all 3 levels have to do their very best to achieve these dates.

Again, I would remark that financing is the overriding consideration, and we must have relief there.

MR. KLASHMAN: I think you should recognize that under the law we have set these dates. While I recognize that there can be some minor slippage if the city does not move ahead vigorously and the State doesn't take the necessary legal steps, if necessary, to make them, I think you have to recognize that the Federal government might. I mean the law is rather clear on this.

## Questions and Answers

So when you say that you don't recognize the dates, I can only say that these are the dates that the State has submitted to us. We do hope that you will be able to fundamentally meet them.

MR. NORTHRIDGE: I would like to say in answer to that, Mr. Klashman, that the city does recognize these dates. However, we do have some question whether or not we would be able to implement them within the time limitations because of the delays that have already been involved in this thing. And also again the same question of financing comes up.

I can recall a meeting a year and a half or so ago held in Concord where at that time the Federal government was guaranteeing 50 percent to these cities and towns. Under those bases there would have been no problem. Now there have been other problems introduced here. And it simply is, as has been pointed out in many instances previously, a question of money and a question of Federal participation in the money problem.

MR. KLASHMAN: I understand. I understand what you said. Let's put it that way.

MR. NORTHRIDGE: Thank you.

MR. KLASHMAN: I would like before you leave to ask you this: Do you know whether the city is considering taking the necessary steps to insure that the industries do pay their



equitable share by passing the necessary city ordinances?

MR. NORTHRIDGE: As far as I know, the city would take those steps. But I would like to point this out: I understand that previously there was a provision whereby if the various industries did join with the city that they were entitled to certain contributions too, and I understand recently Secretary Hickel is entertaining ideas to the contrary of that. Is that true?

MR. KLASHMAN: I am not aware of Secretary Hickel taking any position contrary to what the law and the regulations say. What has happened is that regulations have been issued which call for the municipalities to guarantee to the Federal government that before the project goes into operation they will have a system of cost sharing to insure that the industries pay an equitable share of both the capital costs and the maintenance and operating costs.

In addition, they must insure, if it is necessary for an industry to provide pretreatment in order to avoid jeopardizing the operation of the plant, the municipal plant, that this is done too.

The regulation merely emphasizes what already is in the law, and that is that if a project is a completely industrial waste plant, this would not be eligible. I mean, for example, if there were some arrangement made for the



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municipality to come into an industry to operate its plant, that simply isn't eligible.

But I don't think the Secretary, to my knowledge, has come up with anything indicating that municipalities cannot handle industrial wastes.

MR. NORTHRIDGE: I would like to include this in the record, Mr. Klashman. We are concerned too with the economy of this city, and we think that some thought should be given to balancing the economy with the ecology. We will make every effort to do so.

We will make every effort to participate in programs that will get our industries suitably serviced.

However, I think you realize that it is cheaper to build one large treatment plant for an industry than it is to build two small ones. We have industries in Manchester that are branches. Now, it is very likely that one of these industries would say, "We're going to move to our plant in Georgia and put in one large treatment plant."

It would be wonderful if that plant in Georgia would move to Manchester and put the large treatment plant in here.

But when you are dealing with employment, and employment right at the present time is an important thing to Manchester and to the State, I think everybody should

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make the proper efforts to balance the ecology with the economy.

MR. KLASHMAN: Again, I can merely say that if an industry discharges to a municipal system, and as part of that system, there is nothing in the law or regulations that precludes this. We are participating in that type of project all the time.

As a matter of fact, on this equitable charges situation, the bonding companies are insisting that there be some type of provision where an industry is a substantial contributor to the municipality. We have had a number of cases where the bonding company itself will insist that the contracts that are drawn up provide that if the industry were to move out they would still be obligated to continue paying their share of the capital cost, because otherwise the town would be saddled with that extra facility.

MR. NORTHRIDGE: I can assure you, Mr. Klashman, insofar as industry is concerned and their participation in our treatment plant and overall sewage disposal system, certain provisions, or the necessary provisions, will be made to handle this.

MR. KLASHMAN: Thank you very much.

MR. NORTHRIDGE: As a matter of fact, I would just like to point this out: We not only have water pollution

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problems, but we have air pollution problems. And right at the moment we have got industries participating financially in our air pollution problem in Manchester. On that basis, I would assume Manchester would take the same steps on water pollution.

Thank you.

MR. KLASHMAN: Thank you.

Mr. Healy, do I understand then the final date for these industries for secondary treatment is this December 1975 date but the dates for the completion of plans and start of construction will be furnished to us within 30 days for these other industries?

MR. HEALY: That's correct.

MR. KLASHMAN: Thank you very much.

Do you have anybody else you would like to call?

MR. HEALY: Mr. Haseltine has something to add.

MR. HASELTINE: Is a point of inquiry possible at this point, Mr. Klashman, concerning dates and what not? I would like to ask a question if I could.

MR. KLASHMAN: I'm sorry. The procedures do not provide this. However, may I suggest at lunch you discuss this with Mr. Healy and see if we can't work out something.

MR. HASELTINE: It has been discussed with Mr. Healy in detail. The question would be directed to you.

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MR. KLASHMAN: I will be very happy to discuss this with you later.

MR. HASELTINE: Thank you.

MR. KLASHMAN: Mr. Palazzi, I understand that you wish to make an additional statement.

FURTHER STATEMENT BY

JOHN PALAZZI

MR. PALAZZI: I would like to go a little further on what I think should be done as far as getting this pollution abatement job done, or I mean get it under control here.

When I said pattern it after the highway system, it goes further than that. We need the same system right here in the State. Because we are right here in the middle of a good example of what I am talking about.

If some of you drove in here, you drove by a little sewage treatment plant out here in the parking lot. We cannot afford to have this type of treatment plant all over our little communities. We can't afford it with industry either.

You were talking about industry. We can't afford to have every little industry put in a treatment plant for themselves. It is never going to be run properly. You could never have enough inspectors to look after it. It is just

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not in the works to be handled that way. It has to be handled through the State and the Federal government, with controls. And they have got to build them. They have to put the communities together. When you can't take two communities as close as Manchester and Bedford and get them together and come up with an agreement on how they are going to handle their mutual problem, you're in pretty bad shape.

You have to have some controls, and the State has to do it so that the State can put these communities together. Otherwise you are going to have a million little plants all over the countryside that will never be operated properly because they cannot afford to be operated properly. You can't hire enough people to do it, and you can't train enough people to do it.

So, therefore, you are going to have to build bigger plants, put them together. Where it is near the coast, you can afford then to run it out farther into the ocean. You can do a much better job.

You just mentioned a point that I want to take exception to. Sure, you can commit an industry to pay even after they move out. But if they go bankrupt, what do you do then? What good is that bond provision?

MR. KLASHMAN: I merely mentioned, Mr. Palazzi, that the bonding companies before they will take the bonds



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for sale are insisting in some cases that this be part of the program.

MR. PALAZZI: But it isn't worth the paper it is written on if they go into bankruptcy.

MR. KLASHMAN: Obviously.

MR. PALAZZI: So what I am trying to say is this whole system has got to be reviewed. It has to be reviewed on the Federal level to come up with the answers here. Because, the way we are going at it, the job is just going to be piecemeal and it is never going to work. We're on the wrong tack completely under the system we have now.

Under our laws of New Hampshire we cannot force two communities to go together in one plant. We have no way of doing it. If we are going to take 5 years to try to push them together and get them to talk together -- a good example is Lincoln and Woodstock, close together, not within a half-mile of each other, and the two treatment plants aren't a mile apart -- this is ridiculous.

Neither one of those towns can afford to keep operators on each one.

This business of dates and everything else is fine. I like to see dates. And I would like to promise you that we can get it done tomorrow. But it's bigger than that. We have to look at this whole thing all over again with a complete

John Palazzi

new concept here for the whole country.

It is not going to work the way it is, and it is time that we went further than just setting these dates and telling the communities they have to move and not come up with a better overall plan of getting the job done.

But this is a good example right here. Now, we forced this complex here to build this treatment plant out here, which has never been able to be run properly since it was built. It has been a failure ever since the first day it went into operation.

You just can't have systems like that, gentlemen. And until we get to the real problem here, we are going to just waste the taxpayers' money.

MR. KLASHMAN: Mr. Palazzi, we are not proposing that a large series of small, little plants be built. As a matter of fact, the regulation that I spoke of, having to do with industrial wastes, goes further and spells out the fact that we are encouraging regional systems, regional authorities.

As a matter of fact, any project that now comes before us must be part of a regional plan or we must have some explanation as to why this is not feasible, because of an isolated community, for instance.

So I think we are in agreement with you on what

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you are saying.

MR. PALAZZI: I believe in having industry and the people who pollute the waters pay for cleaning them up, the same as the people who use the highways should pay for them. But I would hate to see the Federal government enforce every little industry having its own little treatment plant, because I know we will never ever get them to be run properly.

MR. KLASHMAN: To my knowledge, that is not the intent, Mr. Palazzi.

MR. PALAZZI: Even pretreatment.

MR. KLASHMAN: Well, on pretreatment, this in many cases is a requirement. For example, we have had cases in which I have been involved of, for example, a large meat-packing complex, --

MR. PALAZZI: Yes.

MR. KLASHMAN: -- and if you were to permit all the manure to just go into the system, you simply couldn't handle it. So there has to be some housekeeping, --

MR. PALAZZI: In some areas I can see it.

MR. KLASHMAN: -- to take care of this.

By the same token, you might have a tannery or a plating company. If you have a plating company that is putting a toxic waste into the system and you have a biological

John Palazzi  
E. Weismantel

system, the system simply won't work, so you have got to do something to take out these toxic materials.

This is what we are talking about in pretreatment, a system that will do that.

MR. PALAZZI: Thank you. I'm sorry to take up so much of your time.

MR. KLASHMAN: Thank you very much, Mr. Palazzi.

Mr. Healy?

MR. HEALY: The gentleman over here.

MR. KLASHMAN: If you wish to make a statement, will you come up here and identify yourself?

STATEMENT BY

E. E. WEISMANTEL

MANAGER, ENVIRONMENTAL CONTROL

THE GENERAL ELECTRIC COMPANY

LYNN, MASSACHUSETTS

MR. WEISMANTEL: I would like to make a statement. My name is E. E. Weismantel. I represent the General Electric Company.

MR. KLASHMAN: Is that the General Electric Company in Hooksett?

MR. WEISMANTEL: I represent the central control function that includes the Hooksett plant.



We have essentially 6 plants around this area, in Massachusetts, New Hampshire, and Vermont.

The question I have is really one of definition to take away some of the ambiguity.

The General Electric Company is very deeply involved in an overall program to reduce the amount of effluents from our plants regardless of what the source is. We have a very extensive program. In fact, the company has committed itself as an overall policy to programs aimed at the improvement of the environment. That is a position the company has taken.

However, the question I have is one with regard to many of the ambiguous things that come up with regard to our pollution laws and the subject of pretreatment.

Being responsible for the operation of a number of large plants, we can afford to make dollar commitments to clean up our effluents. But you get into the problem of assessment of cost. The problem is not so much industries that move away and are still solvent. But, as Mr. Palazzi said, it is the industry that moves away and is bankrupt. Or, likewise, how do you treat new industry that moves in? Do they get a free trip?

I kind of agree that the cost of these things is something that really is kind of hard to tag onto the local



E. Weismantel  
Mrs. Selwyn Taylor

industries -- when we talk also about some of the small operations, the 20- and 30-man plants, that also contribute a share to the pollution problem in total.

In other words, the large industries like our own can carry it. We will meet our responsibilities. But there is an overall fact of how you supply a man who is running a relatively small business with the technology, the assurance that he can conduct an operation of cleaning up his industrial waste.

That is about all I have to say.

MR. KLASHMAN: Thank you very much.

MR. HEALY: Mrs. Selwyn Taylor wears several hats here. She has been very active in the move for clean water in New Hampshire. I won't attempt to identify all of her interests. She will probably state them as she comes up. But we would now like to hear from her.

STATEMENT BY

MRS. SELWYN TAYLOR

WATER RESOURCES CHAIRMAN

LEAGUE OF WOMEN VOTERS OF NEW HAMPSHIRE

MRS. TAYLOR: Thank you, Mr. Healy.

Mr. Klashman, Conferees, Ladies and Gentlemen,  
as Mr. Healy has stated, I am Mrs. Selwyn Taylor of Nashua,

New Hampshire. I am Water Resources Chairman for the League of Women Voters of New Hampshire. I am speaking on behalf of our State League and the 16 local leagues throughout the State of New Hampshire. We thank you very much for the opportunity to express our views here today.

For many years, the condition of the Merrimack and the Nashua Rivers has been the subject of numerous meetings and conferences, volumes of written words, hours of conversation among officials at all levels of government, and much talk among citizens. The manhours of paid and volunteer labor which have been directed to the various aspects of evaluating the condition of the rivers and making plans to improve it must surely be astronomical by this time.

The League has attempted to participate all along the way. We urged that high standards be adopted. We asked that these standards be reached quickly. We have worked for adequate funding at the Federal, State, and local level to accomplish the task. We have supported legislation at all levels of government which we felt would be helpful in achieving the desired results. We, and all the officials and all the citizens and all the other groups who have been speaking out, had one goal in mind for our efforts -- to improve the condition of the two rivers.

Through the years we had thought that surely by

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1970 we would be able to note some definite improvement in water quality. But here we are in late 1970 still talking, still planning, still evaluating, and, it seems to us, still doing considerable haggling about how best to get on with the task, who is to pay, etc., etc., etc. We have all heard it many times before.

Meanwhile, the rivers flow on carrying their burden of filth, and that burden is still increasing every day. People are asking why there is no improvement yet in water quality in the rivers. At least, they are asking the League this question.

It would seem that enough time and enough money have been spent beginning to get started. Now, please, let's begin to finish the job.

New Hampshire's goal for the completion of secondary treatment facilities in the major communities along the rivers is 1975. The League urges that every effort be made to reach that goal. We urge full cooperation and participation between all levels of government and industries to do whatever is necessary and pay whatever is necessary to reach this goal. There is no time left for delays of any sort.

In short, by no later than 1975, the League would like to see adequate treatment of all wastes being discharged

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into the Merrimack and Nashua Rivers.

Thank you very much.

Mr. Healy, if I may be permitted, while I am here, may I speak for the Committee for Better Water?

MR. HEALY: Definitely.

STATEMENT BY

MRS. SELWYN TAYLOR

MEMBER OF THE STEERING COMMITTEE

NEW HAMPSHIRE COMMITTEE FOR BETTER WATER

MRS. TAYLOR: I am a member of the Steering Committee of the New Hampshire Committee for Better Water. Due to various commitments and being abroad by various members of our Steering Committee, I have been asked to submit this following statement to you.

The New Hampshire Committee for Better Water is concerned about the fact that the Merrimack and Nashua Rivers are still grossly polluted.

Our members in the watershed have requested high standards for the rivers and have been willing to support legislation and funding to attain high water quality standards.

We worked vigorously for the passage of New Hampshire's prefinancing legislation in 1969. This was to

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hasten the construction of waste treatment facilities along the Merrimack. We have continually urged that the State shoulder its share of the financial burden for these and other facilities and that the construction of the facilities proceed as quickly as possible.

We have also urged that the Federal government meet its financial responsibilities to assist communities with project funds.

New Hampshire is a tourist State. Our economy depends in part upon what we can offer tourists in beauty and recreation. Polluted rivers and streams entice no one. Our citizens have been demanding clean water and wonder why they have seen no improvement to date.

Our committee would like to see attainment of the standards set for the Merrimack and Nashua Rivers. We would like to see these standards attained with all possible speed.

Thank you very much.

MR. HEALY: Thank you, Mrs. Taylor.

Are there any questions?

MR. KLASHMAN: Are there any questions?

(No response)

MRS. TAYLOR: Thank you.

MR. KLASHMAN: If not, let me just tell you what



our schedule will be. We are going to break for lunch in just a few minutes.

Mr. Fabuss, are you here?

MR. B. M. FABUSS (Technical Director, LTI Research Foundation, Lowell, Massachusetts): Yes.

MR. KLASHMAN: How long will your statement take?

MR. FABUSS: I don't have any statement.

MR. KLASHMAN: How long do you want to talk?

MR. FABUSS: I don't want to talk.

MR. KLASHMAN: You did not want to talk? I misunderstood you.

Is there anyone else who wishes to make a statement here?

(No response)

If not, after lunch, we are going to reconvene at 1:30 p.m., and we are going to cover the schedules for Derry, Franklin, Hooksett, and Plymouth.

The meeting stands adjourned until 1:30 p.m.

(Whereupon, at 12:25 p.m., the meeting was recessed, to be reconvened at 1:30 p.m., this date.)

Edward Haseltine

AFTERNOON SESSION

1:40 p.m.

MR. KLASHMAN: The meeting will reconvene.

What we would like to do, Mr. Healy, in the remaining time, is to go through the remaining towns and review the schedules with you.

Is there anybody you would like to call on before we do that?

MR. HEALY: Before lunch, Ed, I thought there was a comment you wanted to include for the record. As far as I am concerned, I would be glad to hear you make your statement.

MR. KLASHMAN: Do you want to come up here so the reporter can identify you?

FURTHER STATEMENT BY

EDWARD J. HASELTINE

MR. HASELTINE: Thank you, Mr. Chairman, for the opportunity.

The only comment I wanted to make was that when you were discussing dates, completion dates, I wanted to make an inquiry.

We have in our plant in Merrimack gone through the processes of approval both by the State and the Federal government. We have received State approval for funds.

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We have received Federal approval for funds to the tune of a half million dollars. I understand this half million dollars is available. The community has met a debt service in two years in a row. We are advised that this is held up pending the start of the next phase of our contract.

So my comment would be to you, gentlemen, in all sincerity, if you are imposing certain dates on us, we would respectfully submit that you try to meet any commitments that you have to us.

I cite as a specific example this half million dollars which our community has had to pay the debt service on, of two \$250,000 principal payments, through interest payments.

Thank you for the opportunity.

MR. KLASHMAN: Excuse me. Do I understand that this is a half million dollars of Federal funds that is still coming to you?

MR. HASELTINE: We have been advised -- and I think Mr. Metcalf can be of assistance to me here -- that there are Federal funds approved for this project in the amount of a half million dollars that could be paid to our community. It has not been paid to our community.

The reason being given is that they want us to start the next phases 2 and 3 of our construction, which we

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have been working on with every effort we could put forth.

MR. METCALF: That's right. The half million dollars is only a partial grant, as you know, Ed. It is \$500,000 out of a total of a little over \$4 million which is the eligible portion -- or which is the Federal grant which should be applied to this project.

Now, the stipulation for receipt of the half million dollars was this: That Merrimack must proceed with its next contract on its interceptor before it would be in a position to receive this money.

It was my impression really when we asked for this partial grant that, because it had put in a sizable interceptor to pick up the brewery and other work, they could get the money immediately. The interpretation was not that way, and Merrimack is now required to proceed with its next contract to become eligible for this partial payment.

MR. HASELTINE: That's correct. This was my point, Mr. Klashman.

MR. KLASHMAN: I can only say that I will look into this. I am not familiar with the situation, but I will explore it.

MR. HASELTINE: We would be most appreciative, because a half million dollars to a small community is a substantial sum of money.

## Edward Haseltine

MR. KLASHMAN: I just don't know what the reasons are that it is being withheld.

MR. HASELTINE: I might add I suspect, Mr. Klashman, the reasoning behind this is that some of your people somewhere along the line might be fearful that this plant was constructed purely and simply for the Anheuser Busch Corporation, which is not the case. It never was the intent.

The intent of the project was to service the community. Anheuser Busch only provided a vehicle by which we could accomplish this pollution abatement really.

MR. KLASHMAN: Could I ask you a question?

MR. HASELTINE: Yes.

MR. KLASHMAN: Is the plant now handling some municipal wastes? Or is it handling just the brewery?

MR. HASELTINE: No, it is handling the waste of the Nashua Corporation, which is another sizable industry.

MR. KLASHMAN: What about domestic wastes?

MR. HASELTINE: Domestic waste is in the next phase of this contract that I indicated earlier we hope to put out to bid within a period of 30 days. We are going to then take the two broad dumps that our community is making into the Merrimack River out of the Merrimack River with the next phase of this contract, and that will provide the domestic.



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MR. KLASHMAN: I understand. I would like to discuss this with you later if I may.

MR. HASELTINE: Okay. I will appreciate anything you can do for us, Mr. Klashman.

MR. HEALY: Could I add this? The State's position is the town should receive the money. The town was told and was in agreement with us that they intended to do the whole job, that they would not halt their efforts once the brewery and the other industrial waste portions of the program were under control. In order to continue to receive State funds, this would be necessary.

We think it is in order for the town to be paid, and we have so certified to your office.

MR. KLASHMAN: We will look into this, and I will discuss this with you individually later.

We would now like to discuss the dates for Derry, New Hampshire. As I understand it, Derry required some additional treatment. Do they now have chlorination? As I recall, in the last --

MR. HEALY: Just about. The chlorination project was slowed down because of the truck strike. The other facilities associated with the chlorination unit itself went on forward to completion of construction. I believe now that all of the facilities are there and the plant is operative.

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MR. KLASHMAN: That is, the chlorination is now operative?

MR. HEALY: Yes.

MR. KLASHMAN: Do they need any additional treatment to handle the current load? Is that plant overloaded? Or is it satisfactory now?

MR. HEALY: We feel that it is marginal and that there are periods when it is overloaded. The town of Derry has grown tremendously, and its oxidation pond system has been at peak design capacity for sometime. Still other developments come into town, and they wish to connect to the system.

The Commission has been carrying on discussions with the town of Derry officials with a view to two things:

One, a development of plans for expansion of the treatment system and associated improvements to the existing collection system.

Secondly, to undertake temporary measures or intermediate measures, may I say, to improve the present plant.

This would consist of the installation of aeration equipment. It would not only take care of the present difficulties the town is experiencing, but it would have long-range advantages at the lagoons.

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I am told that they do intend to do this with the benefit of State and Federal assistance, because we believe it is eligible for grant money. It will allow the town to proceed with orderly expansion of its resources for some period into the future.

However, in the meanwhile, looking to the ultimate solution, the town will have to have either more lagoons or some other associated additions -- well, in the form of conventional treatment -- to take care of the ultimate growth.

MR. KLASHMAN: Is there a preliminary plan already completed on this?

MR. HEALY: Yes, there is.

MR. KLASHMAN: When was that completed? Do you recall?

MR. HEALY: It was completed in December of 1968, I believe.

MR. METCALF: Two years ago.

MR. HEALY: Nearly 2 years ago. The town at its last meeting in March 1970 voted in the majority to authorize the selectmen to go ahead with the recommended improvements. However, they did not obtain the necessary two-thirds majority.

In this State, in order for a money issue to be

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approved, it is necessary that there be a two-thirds majority in favor of it. Majority alone is not enough.

MR. KLASHMAN: If the town does not approve expanding their facility and if their facility is overloaded, is the State going to take steps to stop any future connections, sewer connections?

MR. HEALY: That would be our approach, yes. Well, as a matter of fact, the present law was amended in 1967 to require that any town or industry or individual that might be discharging sewage water to the State obtain a permit from the Commission. This is subject to revision annually or at whatever other interval the Commission decides, so as to control the quality of the discharge.

In other words, the efficiency of treatment obviously is a matter of consideration here.

So that the town of Derry, along with all of the communities in the State, will have to obtain permits from time to time from the Commission to discharge treated effluents into the waterways of the State. And this program we are beginning to initiate now.

MR. KLASHMAN: When do you anticipate that you will actually have a schedule for when they are going to get their plans completed?

MR. HEALY: I fully expect the town of Derry will



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go ahead on an interim basis now, provided it receives assistance in the way of grants, with the installation of aeration equipment.

MR. KLASHMAN: Which will solve the immediate problem?

MR. HEALY: Which will solve the immediate problem and take care of other expansion in the community of a modest nature. But in the long range there will have to be, in addition to aeration, more lagoon capacity installed.

MR. KLASHMAN: When do you expect that part of the expansion to be completed?

MR. HEALY: That portion could be handled in two ways. It could be handled by special meeting of the town, or the matter could be taken up in March 1971 and acted upon at that time.

The basis for action is available. The engineer's report is still pertinent and can be used, with I think some relatively minor adjustments.

MR. KLASHMAN: Do they actually have plans developed for installation of the aeration devices? I mean have the engineers actually recommended --

MR. HEALY: The State has recommended it, and the town engineer has recommended it.

MR. KLASHMAN: But has he already got something



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designed?

MR. HEALY: They have talked with suppliers, and I think you will shortly be furnished plans for this type of installation.

MR. KLASHMAN: Would you say such a thing would be in operation by December of 1971?

MR. HEALY: December of 1971?

MR. KLASHMAN: Yes.

MR. HEALY: Oh, yes, I would say much before then.

MR. KLASHMAN: When do you think it will be?

MR. HEALY: Well, within a period of months this could happen and should happen.

MR. KLASHMAN: Could we leave it that within 30 days you will give us a schedule?

MR. HEALY: We can give you a schedule, yes. We intend to have a meeting very soon with the town and its attorney. As an outgrowth of that discussion, we ought to be able to furnish you with some firm dates.

MR. KLASHMAN: Fine. We will get some dates from you within a 30-day period.

MR. HEALY: Yes. Right.

MR. KLASHMAN: Now, Franklin. In Franklin, as I understand it, there was a proposal to put in an oxidation ditch. That was the last we heard.

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MR. HEALY: No, there was a proposal to install conventional lagoon facilities or oxidation ponds.

MR. KLASHMAN: What is the status of that?

MR. HEALY: I think the matter is under review again. Meanwhile, the town has lost an industry and I think wishes to examine the possibility of aerated lagoons.

MR. KLASHMAN: Do they have a preliminary plan?

MR. HEALY: They have finals completed for the lagoon system.

MR. KLASHMAN: When was that completed?

MR. HEALY: Very recently.

MR. METCALF: Well, within-- Just about last March, 1970.

MR. KLASHMAN: March 1969?

MR. METCALF: 1970.

MR. KLASHMAN: In March 1970 the plans were completed?

MR. METCALF: Yes.

MR. KLASHMAN: When do you expect that this might be funded, start construction, and be in operation?

MR. HEALY: We were prepared to take it on as a prefinanced project, weren't we?

MR. METCALF: That's right. And the city has authorized floating of a bond issue for their share. So as

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far as funding is concerned, it is imminent. The only thing to be resolved is what type of treatment facility.

MR. KLASHMAN: When do you expect the funding to be completed? In the next few months?

MR. METCALF: Yes. Within 2 to 3 months' time.

MR. KLASHMAN: So that would be --

MR. METCALF: Say 30 December.

MR. KLASHMAN: December 1970?

MR. METCALF: Yes.

MR. KLASHMAN: And when might they start construction?

MR. HEALY: Well, there will have to be a decision arrived at with reference to the treatment.

MR. KLASHMAN: Can we leave it you will also give us those dates within 30 days?

MR. HEALY: Yes.

MR. KLASHMAN: The start of construction and when it will be in operation?

MR. HEALY: I have to premise that on an agreement on whether they want to have conventional lagoons or whether they want to have aerated lagoons. This has been a basis of discussion between us, the city, and the city's consultant, and it hasn't been fully decided.

MR. METCALF: One other thing, Mr. Klashman. I

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think we have to take into consideration the fact the city is now negotiating with another industry to come into the J. P. Stevens plant, and it depends entirely upon what that industry is going to put into the system.

MR. KLASHMAN: Do I understand that the J. P. Stevens Company is now closed?

MR. METCALF: They have closed. Yes.

MR. HEALY: They have closed. We don't even know the name of the industry. We know that it would involve a discharge of a certain amount of wastes. And hydraulically the plant as designed can take it. However, from a BOD loading point of view it would involve aeration. And this aspect, as I say, is under discussion with the community right now. As soon as that is settled, we will know more clearly which way we are going and the timing of it.

MR. KLASHMAN: But we will have some --

MR. HEALY: We will have whatever information we can provide you in 30 days.

MR. KLASHMAN: Hooksett. Is the municipal project completed there for Hooksett?

MR. METCALF: Yes.

MR. KLASHMAN: When was that completed? Do you know approximately?

MR. METCALF: I would say 1 July 1970.

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MR. KLASHMAN: Is that in operation now?

MR. METCALF: That is in operation now.

MR. KLASHMAN: Is the French Bros. Beef Company hooked into that?

MR. METCALF: Yes, it is.

MR. KLASHMAN: So that was being treated by July 1, 1970?

MR. METCALF: Yes. That is in the system. You said French Bros, didn't you?

MR. KLASHMAN: Yes, French Bros. Beef Company. And is the General Electric Company hooked into this too?

MR. WEISMANTEL: I don't think the line goes up there, but I am not speaking with total authority. I know we aren't hooked in. I don't know the reason. I will check that.

MR. KLASHMAN: Well, can we have --

MR. METCALF: We can tell you.

MR. KLASHMAN: -- within 30 days the schedule, either that General Electric is --

MR. HEALY: What the disposition is.

MR. KLASHMAN: Whether it is hooked in or what is going to be done and the dates for getting them connected.

MR. METCALF: Yes.

MR. HEALY: Right.



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MR. KLASHMAN: The last community is Plymouth.

MR. HEALY: Plymouth has a treatment plant in operation.

MR. KLASHMAN: Is that a secondary treatment plant?

MR. HEALY: No, it is a primary plant.

MR. KLASHMAN: What is the schedule for them? What is the date when they will --

MR. HEALY: We have in our schedule submitted to your office indicated a date of completion of the secondary facilities by December of 1972.

MR. KLASHMAN: When will the construction start?

MR. HEALY: We would have to start construction approximately a year and a half earlier. Say June of 1971.

MR. KLASHMAN: What about the completion of the plans?

MR. HEALY: The town has not started plans as far as I am aware.

MR. METCALF: No.

MR. KLASHMAN: Is the preliminary planning done on this yet?

MR. METCALF: Oh, yes.

MR. HEALY: Preliminary planning, Clarence?

MR. METCALF: Yes. Preliminary planning is done.

MR. KLASHMAN: Do you know when that was done?

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MR. METCALF: Let's see. It was done back in 1967.

MR. KLASHMAN: Could you submit to us within 30 days the date the plan was done, the date the final plans will be done, funded, and when the plant will be completed?

MR. METCALF: Yes.

MR. FITZPATRICK: Where does the present plant discharge?

MR. HEALY: To the Pemigewasset. It has two plants. Actually, there is a small lagoon system along the Baker River, and that system is still in operation and I expect will continue.

MR. FITZPATRICK: Will it continue when the secondary plant is in?

MR. HEALY: As far as I am aware, yes.

MR. FITZPATRICK: What goes into the lagoon? What does this consist of? A portion of the town?

MR. HEALY: Yes. The northwestern portion of the town, plus some of the Plymouth State College.

MR. FITZPATRICK: Is the lagoon chlorinated?

MR. METCALF: No.

MR. HEALY: No, it is not. As a matter of fact, the lagoon is so large that there hasn't been any discharge to the river. It seeps into the subsoil, doesn't reach the stream as such. It goes in naturally to the groundwater flow,

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but there is no organized discharge to the river at this point.

MR. FITZPATRICK: I see.

MR. KLASHMAN: Mr. Metcalf, when we were talking before about Merrimack, as I recall, we were talking about --

MR. HEALY: Mr. Chairman, could we return to Plymouth again?

MR. KLASHMAN: Go ahead.

MR. HEALY: I had some misgivings about this 1972 date. I have just now talked to Mr. Metcalf. We feel it was December 1973.

MR. METCALF: We should check those dates.

MR. HEALY: I would like an opportunity to check the dates.

MR. METCALF: It is in here as 1972, but I didn't think we agreed on 1972.

MR. HEALY: Could we reply on that within the 30-day period?

MR. METCALF: I question the date. I want to check it against what I have.

MR. KLASHMAN: The date that you have submitted, as I understand it, is December 1972. If there is any difference on that, you will tell us?

MR. METCALF: Yes. We will communicate.

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MR. KLASHMAN: When we were talking earlier about Merrimack, as I recall, we were talking about the New Hampshire Plating Company and the Merrimack Leather Company. We had the information that the facility would be in operation by October 1971 -- in other words, that the interceptor would be completed. But we didn't have the dates when the funds would be appropriated and when construction would start. Can we firm up on those dates now? That was for the two industries.

MR. METCALF: And the two industries are going to go into this interceptor which is now out to bid.

MR. KLASHMAN: Oh, the interceptor is now out to bid. The question is when will they hook in?

MR. METCALF: Within 30 days they will be out to bid. This is tied in --

MR. HEALY: It is tied in with Mr. Haseltine's request for the money due the town now.

MR. METCALF: Yes, it is tied in quite directly, because Mr. Klashman's office has indicated that until they put that new contract out to bid and let a bid, they will receive no money. So obviously Mr. Haseltine is anxious to get that work under way. And that work will pick up New Hampshire Plating and the other industry.

MR. KLASHMAN: Are the funds available now?

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MR. METCALF: Yes, the town has prefinanced all the funding.

MR. KLASHMAN: When do you plan that they will start construction?

MR. METCALF: I think when Mr. Haseltine was asked he indicated within 30 to 60 days.

MR. KLASHMAN: So that would be by --

MR. METCALF: Say by 1 January anyway they should be --

MR. HEALY: There should be an award.

MR. METCALF: There should be an award. And they should be under construction, allowing for weather, within 30 to 60 days after that.

MR. KLASHMAN: So they will actually start construction before the spring of 1971?

MR. METCALF: Yes.

MR. KLASHMAN: Which would be by March of 1971? Is that correct?

MR. METCALF: That's right. I wouldn't anticipate they would have it completed by October of 1971.

MR. KLASHMAN: Well, if it won't be completed by October, when do you think it will be completed?

MR. METCALF: Well, it is almost 40,000 feet of interceptor. I think it would take at least a year and a half to get this done.



MR. HEALY: So by the fall of 1972 it should be --

MR. METCALF: By the fall of 1972 it should be in operation.

MR. KLASHMAN: What you are saying is construction will start on the interceptor --

MR. HEALY: By the spring of 1971.

MR. METCALF: March of 1971.

MR. KLASHMAN: -- by March of 1971 and will be completed by --

MR. METCALF: By October of 1972, which falls in line with our dates on the industries.

MR. KLASHMAN: On the industries, the date you had that they would hook in was November 1971. That was the date that was in the standard.

MR. METCALF: Yes.

MR. KLASHMAN: And you are saying now that this hook-in will take place probably --

MR. METCALF: A year after that.

MR. KLASHMAN: Probably September of --

MR. METCALF: Ten months after that.

MR. KLASHMAN: The industries are going to have to hook in. Right?

MR. METCALF: That's right.

MR. KLASHMAN: What I want to do is to get the date

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they will actually hook in. Is this --

MR. HEALY: I think that is going to be pretty difficult.

MR. METCALF: The thing I am trying to say now is that the industry cannot hook in, obviously, until the town completes its work on this interceptor. And this interceptor is going to be delayed for one reason or another some 8 to 9 months beyond the date which we anticipated a few years ago. So I am saying now that it is probably going to be around October of 1972 instead of --

MR. KLASHMAN: That will be the date then that the industries will hook into it?

MR. METCALF: Yes.

MR. HEALY: Yes.

MR. KLASHMAN: So the construction for that hook-in will probably be a month before? Is that right?

MR. METCALF: That's right. Say a month.

MR. KLASHMAN: So it will be September 1972 when they will start construction?

MR. HEALY: Well, what I am curious about, Mr. Chairman, is it seems to me we are getting down to very minute considerations as to which month this connection might be made. I don't want to be tied down that closely. I don't think there is any necessity for it.

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In other words, presumably, if we follow this thing through to its ultimate conclusion, if we had agreed to, say, and talked about the month of September and if we didn't have it done in September, everything could cease in the way of grants until this thing was done. It might be that it wouldn't occur until a couple of months later. And I don't think that is very significant.

MR. KLASHMAN: Well, could we have, then, Mr. Healy, that you will furnish us the date that --

MR. HEALY: I would hesitate. I would furnish you the target dates, which we have done repeatedly, and I will do it in good faith, as to when we think we will get the plant done. Then the order of connections may be-- Certainly they will go forward just as rapidly as possible, because the community will need the income. We will be on their backs to get the work done. I think it will flow very readily.

But I don't think that we ought to be too concerned about the particular date on which that industry connects. And this isn't to evade the issue at all. I think --

MR. KLASHMAN: Well, I have no choice, Mr. Healy, but to --

MR. FITZPATRICK: I think one of the reasons --

MR. HEALY: I think we are doing a lot of wishful thinking if we are going to get down to specific dates for

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industry.

MR. KLASHMAN: The thing is, Mr. Healy, that the industries have to have their wastes treated, --

MR. HEALY: Precisely.

MR. KLASHMAN: -- and either the industries --

MR. HEALY: I think there has to be a degree of confidence in the State of New Hampshire that we will follow through and honor our obligations. And this includes getting the industry either into that system or under treatment on its own. Clearly, we prefer to have it in the municipal system if it is at all possible.

MR. KLASHMAN: The issue, Mr. Healy, is that the New Hampshire Plating and the Merrimack Leather-- In the case of the plating company, I suspect that it will be necessary for them to provide some type of pretreatment, because the toxic wastes --

MR. HEALY: Possibly so, yes.

MR. KLASHMAN: -- from the metal plating will require that they do some work to take these toxic materials out.

In the case of the leather company, I don't know. It is very likely that they too might have to have some type of pretreatment. Therefore, it is necessary that we have dates when you are going to expect them to do this and when

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they will have their wastes fully treated by either themselves or by the municipality.

So if you cannot give us the dates now, if you could give us this within 30 days, that would be helpful.

MR. HEALY: It will still be conditioned upon the statements that I have made here. I think we are refining this issue too much.

MR. KLASHMAN: If you have conditions, I have no control over any conditions you put in. But we will require some type of statement from you. And we can expect to have it in 30 days?

MR. HEALY: Could we give you a spread of dates? A range of time?

MR. KLASHMAN: No, I have to have a specific, an outside --

MR. HEALY: Does it have to coincide with the same date as the municipality?

MR. KLASHMAN: It would seem to me if the interceptor is going through, from my knowledge of engineering, there is definitely going to be a provision made in that interceptor for a tap. I mean while they have the thing excavated I would think --

MR. HEALY: Yes.

MR. KLASHMAN: -- they would make the tap and that



## Questions and Answers

the industry would take the steps to lay their pipe and hook in.

MR. HEALY: I think that the two jobs will be done in sequence, but I don't agree that they will be done simultaneously. Our experience is that they lay the interceptor and it is checked. If everything is acceptable, then they start making their connections.

But the interceptor work has to be checked out to be sure it is acceptable. And we don't want other flows coming into the interceptor while we are checking for any dry-weather flows.

MR. KLASHMAN: What you are saying is the hook-in will be after October 1972?

MR. HEALY: That is what I am saying.

MR. KLASHMAN: If we can get a date --

MR. HEALY: Well, we will time it certainly just as rapidly after that as possible.

MR. KLASHMAN: If we can get a date --

MR. HEALY: But if we run into, as we have had in a project or two recently-- There was faulty work done on the interceptor line. It had to be relaid. The people who were going to be connected were set back. They couldn't connect up because of the work having to be repeated.

We don't want to get into that sort of a

Questions and Answers  
Myron Knudson

straitjacket. It won't serve any useful purpose if we do.

MR. KLASHMAN: We understand, Mr. Healy. If you can give us these dates with the understanding --

MR. HEALY: We have to deal with all these contingencies.

MR. KLASHMAN: I understand. But if we can get those dates also within 30 days, that would be fine.

Do you have any other comments?

MR. FITZPATRICK: No.

MR. KLASHMAN: I would like to call on Mr. Knudson to summarize the municipalities and industries where you will be furnishing us these dates for the preliminary plans, completion of final plans, the funding, start of construction, and when the facility will be in operation -- the dates you were going to give us in 30 days.

Before Mr. Knudson speaks, is there anybody else who has any statement they wish to make?

(No response)

If not, Mr. Knudson, would you summarize this?

STATEMENT BY

MYRON ORAN KNUDSON

CHIEF, OPERATIONS BRANCH, NEW ENGLAND BASINS OFFICE

FEDERAL WATER QUALITY ADMINISTRATION

MR. KNUDSON: My name is Myron Oran Knudson, Chief,

Myron Knudson

Operations Branch, New England Basins Office, Federal Water Quality Administration.

Boscawen will tie to the North Concord treatment plant. The appropriation of funds date is 6/71. Start of construction, 6/71. Facility in operation, 12/73.

MR. KLASHMAN: What I want is only those communities and industries where they are going to have to give us the information within 30 days. Would you just summarize this for us?

MR. KNUDSON: The town of Derry.

The municipality of Franklin.

General Electric Company in Hooksett.

The town of Hudson.

The appropriation of funds date for the city of Manchester.

The complete dates for the industries in Manchester, and one State facility, the Manchester State Industrial School. The industries are Waumbec Mills, Stevens Spin Company, Seal Tanning Company, M. Schwer Realty, M.K.M. Knitting Company, Manchester Hosiery Company, Granite State Packing Company, and Foster Grant Company, all in Manchester.

The dates for the industries in Merrimack, New Hampshire, the New Hampshire Plating Company and the Merrimack Leather Company.

## Myron Knudson

In Nashua, the industries --

MR. KLASHMAN: Excuse me. We have the final dates on A. Busch, New Hampshire Plating Company, and Merrimack Leather Company, October 1972. So you are getting the interim dates on that?

MR. KNUDSON: Interim dates.

MR. KLASHMAN: Okay. Go ahead.

MR. KNUDSON: In Nashua, the appropriation of funds and start of construction dates for Sanders Associates, Johns Manville, --

MR. KLASHMAN: Excuse me. That is the Sanders Associates' Canal Street plant?

MR. KNUDSON: Yes, sir.

MR. KLASHMAN: Thank you. Go ahead.

MR. KNUDSON: The other facility is connected.

Continuing, Johns Manville, Ferrersflex Company, --

MR. KLASHMAN: Excuse me. On the Ferrersflex Company it was the Pine Street extension?

MR. KNUDSON: Pine Street extension.

MR. KLASHMAN: Right. Go ahead.

MR. KNUDSON: The Brown Pro. Inc. I guess that is "Produce, Inc." The Granite State Tanning Corporation. Sprague Electric Company.

The town of Plymouth, New Hampshire for their

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secondary treatment facility.

MR. KLASHMAN: The Manchester State Industrial School in Manchester.

MR. KNUDSON: Yes, sir. I mentioned that.

MR. KLASHMAN: Are there any questions on the part of the panel? Mr. Peloquin?

MR. PELOQUIN: No.

MR. KLASHMAN: Mr. Fitzpatrick?

MR. FITZPATRICK: No.

MR. KLASHMAN: If not-- Mr. Casazza?

MR. HEALY: Mr. Casazza stepped out for a moment.

MR. KLASHMAN: If there are no other comments, this meeting will stand adjourned, and we will reconvene at Tewksbury, Massachusetts at the Holiday Inn tomorrow morning at 9:30 a.m.

(Whereupon, at 2:20 p.m., the meeting was adjourned, to be reconvened at Holiday Inn, Tewksbury, Massachusetts, at 9:30 a.m., Wednesday, October 21, 1970.)

\* \* \*



136-A

SECOND SESSION

(Reconvened in Workshop Sessions)

of

CONFERENCE IN THE MATTER OF  
POLLUTION OF THE WATERS OF THE  
MERRIMACK AND NASHUA RIVERS  
AND THEIR TRIBUTARIES

Sheraton Wayfarer Motor Inn  
Bedford, New Hampshire  
October 20, 1970  
and  
Holiday Inn  
Tewksbury, Massachusetts  
October 21, 1970

Volume II

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WORKSHOP SESSION

The second session of the Conference in the Matter of Pollution of the Waters of the Merrimack and Nashua Rivers and their Tributaries was reconvened in workshop session, pursuant to adjournment the previous day, at 9:35 a.m., Wednesday, October 21, 1970, at the Holiday Inn, Tewksbury, Massachusetts.

**PRESIDING:**

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Director, Northeast Region  
Federal Water Quality Administration  
Boston, Massachusetts

**CONFEREES:**

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Director  
Massachusetts Department of Natural Resources  
Boston, Massachusetts

Edward V. Fitzpatrick  
Director  
New England Basins Office  
Federal Water Quality Administration  
Needham Heights, Massachusetts

W. A. Healy  
Executive Director  
New Hampshire Water Supply and Pollution Control  
Commission  
Concord, New Hampshire

Alfred E. Peloquin  
New England Interstate Water Pollution Control  
Commission  
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and  
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## Opening Statement - Mr. Klashman

## OPENING STATEMENT

BY

LESTER M. KLASHMAN

MR. KLASHMAN: The meeting is open.

This is the second day of the workshop session for the second session of the conference in the matter of pollution of the waters of the Merrimack and Nashua Rivers and their tributaries in the States of New Hampshire and Massachusetts.

The first session of this conference was initiated in 1964 in accordance with a request from Endicott Peabody, then Governor of Massachusetts, and on the basis of reports, surveys, and studies under the provisions of the Federal Water Pollution Control Act. The first session was held on February 11, 1964, with the second session held on December 18, 1968.

Both the State and Federal governments have responsibilities in dealing with water pollution control problems. The Federal Water Pollution Control Act declares that the States have primary rights and responsibilities for taking action to abate and control pollution. Consistent with this, we are charged by law to encourage the States in these activities.

At the same time, the Secretary of the Interior



## Opening Statement - Mr. Klashman

is charged by law with specific responsibilities in the field of water pollution control in connection with pollution of interstate and navigable waters. The Federal Water Pollution Control Act provides that pollution of interstate or navigable waters which endangers the health or welfare of any persons shall be subject to abatement. This applies whether the matter causing or contributing to the pollution is discharged directly into such waters or reaches such waters after discharge into a tributary.

The purpose of the conference procedure is to bring together the State and interstate water pollution control agencies, representatives of the U. S. Department of the Interior, and other interested parties to review the existing situation and the progress which has been made to comply with the conference recommendations, to lay a basis for future action by all parties concerned, and to give the States, localities, and industries an opportunity to take any indicated remedial action under State and local law.

Under the conference procedures, through a cooperative State-Federal effort, remedial programs have been established for the Merrimack-Nashua Rivers. Through these workshop sessions, we will evaluate the effectiveness of the present pollution abatement programs with a view toward developing further requirements where indicated.

## Opening Statement - Mr. Klashman

These workshops will allow us to examine particular problem areas in depth and will provide the opportunity for the presentation of statements and views by all water use interests for the consideration of the conferees.

The schedule for the workshops was the meeting yesterday at Bedford, New Hampshire at the Sheraton Wayfarer Motor Inn and today here in Tewksbury at the Holiday Inn.

The conferees at today's workshop are:

Massachusetts Department of Natural Resources, represented by Thomas McMahon.

New Hampshire Water Supply and Pollution Control Commission, represented by Mr. William Healy.

The representative of the New England State Water Pollution Control Commission, Mr. Alfred Peloquin.

Edward Fitzpatrick is the Federal conferee at this workshop, and he is the Director of the New England Basins Office of this region of the Federal Water Quality Administration, U. S. Department of the Interior, with headquarters in Boston.

My name is Lester Klashman. I am the Regional Director, Northeast Region of the Federal Water Quality Administration.

Now a word about the procedures governing the conduct of the meeting. The conferees will be called upon to

## Opening Statement - Mr. Klashman

make statements. The conferees, in addition, may call upon participants whom they have invited to the meeting to make statements. In addition, we shall call on other interested individuals who wish to present statements. The U. S. Department of the Interior has also invited a number of municipalities and industries and citizens' groups to participate in the workshop sessions. At the conclusion of each statement, the conferees will be given an opportunity to comment or ask questions, and I may ask a question or two. This procedure has proven effective in the past in reaching equitable solutions.

A record and verbatim transcript of the meeting is being made by Joe McLaughlin, Ace-Federal Reporters, Inc., Washington, D. C. This is being made for the purpose of providing a complete record of what is said here.

I would suggest that all speakers and participants other than the conferees making statements come to the lectern and identify themselves for purposes of the record.

I should now like to ask, Mr. Healy, if you have anything further to say at this time.

MR. HEALY: No comments.

MR. KLASHMAN: Mr. Peloquin?

MR. PELOQUIN: No, sir.

MR. KLASHMAN: Mr. Fitzpatrick?

Thomas McMahon

MR. FITZPATRICK: No.

MR. KLASHMAN: Mr. McMahon?

MR. McMAHON: Mr. Chairman, the first issue of business here is the statement we always read at these conferences. I do wish this to be on the record, not off the record.

The Massachusetts Division of Water Pollution Control is present today in the spirit of cooperation with the Federal Water Quality Administration, New England Interstate Water Pollution Control Commission, and New Hampshire Water Supply and Pollution Control Commission. Any material, whether written or oral, presented at this conference shall in no way commit the Commonwealth of Massachusetts to changes in the standards of water quality approved by the Massachusetts Water Resources Commission and the Secretary of the Interior and shall not convey any authority to transcend the jurisdictional authority vested in the Massachusetts Clean Waters Act or the Federal Water Pollution Control Act.

Mr. Chairman, what I would like to do this morning is read a prepared statement which I have. I would then like to call on certain staff members to give a status report on the implementation schedules for the Merrimack and Nashua and other pertinent river basins, the subject of this conference.



Thomas McMahon

MR. KLASHMAN: Very well, Mr. McMahon. We will look forward to your statement.

STATEMENT BY

THOMAS C. McMAHON, CONFEREES

MR. McMAHON: I am certainly honored and pleased to be here today and to be able to address you during a most timely and important conference on the pollution problems of the Merrimack and Nashua Rivers. Both of these rivers are severely degraded and cannot provide the needed and desired beneficial water uses to the citizens of this Commonwealth consistent with the standards adopted under the Massachusetts Clean Waters Act of 1966.

Progress is being made, good progress, but the solution to water pollution must be accelerated, must be augmented by massive infusion of Federal funds, and a consistent and equitable bureaucratic approach to municipal and industrial waste treatment problems.

The current Massachusetts program of water pollution control was initiated in September of 1966 with the enactment of 4 major bills into law:

Chapter 687 established a \$150 million State construction grant program, including \$1 million a year for a research and development program designed to develop new



Thomas McMahon

and improved waste treatment methods.

Chapter 685 created a new Division of Water Pollution Control under the Water Resources Commission in the Massachusetts Department of Natural Resources with complete authority to implement, administer, and enforce water pollution control within the Commonwealth.

Chapters 700 and 701 provided for corporate and local tax-incentive assistance to industries installing suitable industrial waste treatment plants.

Succeeding legislation to date includes an additional \$250 million bond issue for construction grants including a continuation of the prefinancing of the Federal share in anticipation of future Federal reimbursements, also a \$25 million low-interest loan program for industry, stringent oil pollution laws incorporating emergency cleanup funds, a mandatory certification requirement in the State, boat pollution and marina control authority, an ocean disposal law, and streamlining the administrative enforcement capabilities of the division.

These bills were signed into law during the last session of the Massachusetts Legislature.

Presently on an implementation schedule there are some 456 significant pollution sources in the Commonwealth, of which 121 are communities, 324 are industrial sources,

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and 11 are in the miscellaneous category. A total of 80 orders and consent orders have been established to industrial firms and communities that have not met reasonable deadlines, and it is anticipated that this number will increase substantially in the next several years.

Programs for the training and retraining of waste treatment operators have been advanced by training courses at a number of locations, and 22 research and demonstration projects pertaining to State-oriented water pollution problems are now under contract. Surveillance of water quality and treatment plant efficiencies are evaluated by sampling programs, automatic water quality monitoring stations, and comprehensive stream studies.

In summary, the major organizational and functional components of a good water pollution control program for the Commonwealth of Massachusetts have been established.

Since the passage of the Massachusetts Clean Waters Act and the initiation of a meaningful waste treatment program in the State, some of the most complex and perplexing problems have evolved from the established general policy of encouraging joint treatment facilities where the industrial waste contribution is greater than the domestic flow of the community.

The first situation where innumerable industries

Thomas McMahon

are involved requires the technical evaluation and amenability of the waste products, the adoption of sewer ordinances, pre-treatment requirements, and the design and construction of unit processes needed at the central treatment works.

The second and corollary situation occurs where 1 or more industries constitute the majority of waste discharges in a community.

The question arises under what circumstances are such facilities eligible for financial assistance under the Federal and State construction grants programs.

The present policy, shared by many States and the Federal government up until several months ago, allows a community to receive grants for the construction of exclusively or primarily industrial waste treatment works for industry if the community is the applicant, owns the land, is a taxing authority, and agrees to operate and maintain the facility. In an attempt to establish equitability and fairness and at the same time provide the best water quality and the most appropriate disposition of grant funds, this State has continually felt these general criteria too lenient.

The statutory responsibility and direction of the Division of Water Pollution Control has been made quite clear on this particular subject and has been substantiated by a formal opinion from Elliot L. Richardson, the former

Thomas McMahon

Attorney General of the Commonwealth.

In essence, interpretation of the salient passages of Chapter 685 of the acts of 1966 caused the Attorney General to conclude that they contemplate the use of State funds by municipalities for waste treatment facilities devoted exclusively to the disposal of industrial waste. "There is nothing in the Clean Waters Act to suggest that every facility constructed with State funds need be of a general-purpose type. Indeed, the specific reference to 'industrial' wastes in the above-quoted definition of 'facilities' in (the General Law) suggests an intention to single out industrial waste as a particular target for legislative attack.

"Moreover, the plan which a water pollution abatement district (and hence, a municipality) files with the Division as a condition precedent to receiving State aid 'shall include detail as to the sources of pollution within the district' and 'the means by which . . . such pollution is to be abated . . . . If as in the cases described in your letter, the 'sources of pollution' are 1 or more industrial plants within the municipality and the means of abatement is a waste treatment facility adapted to processing of such industrial waste, the denial of funds might leave serious gaps in the anti-pollution program of



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the Commonwealth. I do not think the Legislature intended to circumscribe the availability of Commonwealth funds in such arbitrary manner."

This is a quotation again from the official opinion from Elliot L. Richardson.

In pursuing this particular policy, a bill was filed and passed in the Massachusetts Legislature in 1968 to clarify certain definitions and to allow communities to be authorized to bond for their share of a project on projects serving primarily or exclusively industry or industries.

The foregoing delineates a general course of integrated domestic and industrial programs of waste treatment and in our opinion depicts a positive and efficient philosophy for solving pollution problems on a Statewide basis. It is necessary, however, to ascertain potential water quality benefits and justify the judicious use of State funds in projects that will insure industrial participation and longevity.

The Division of Water Pollution Control has adopted the following criteria in order to provide, at least in our opinion, a proper balance between the possibility of improper subsidization and providing and protecting the State's bond-issue monies for safe and beneficial water quality improvement projects.



Thomas McMahon

These criteria are as follows:

The Division of Water Pollution Control will consider a State grant application in instances where:

1. The treatment facility constitutes an integral unit in an overall regional or municipal sewerage program;
2. There is an approved comprehensive engineering report considering the industrial waste problems in conjunction with the municipal problem;
3. The town, city, or district owns the land for the treatment facility or facilities, is a taxing authority, and agrees to finance the construction and construct and operate the facility or facilities;
4. The results from a water quality standpoint are to be more beneficial;
5. Pretreatment is not required before connection to a municipal system in order to meet the rules and regulations adopted by the community and approved by this Division;

-- and what that really says is that we do not participate in pretreatment --

6. Suitable arrangements with the community be

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determined by contract for proper operation and maintenance of the facilities; and

7. The industry has a satisfactory credit rating and historical profit-and-loss record or can reasonably assure participation in the facility over the life of the plant.

These criteria constitute a portion of the State's program plan and is the course recommended for the State in future municipal-industrial waste treatment programs.

It is unfortunate that little or no credence to State comments on 18 CFR 601 was given and new regulations covering Federal grants for construction of waste treatment facilities went into effect on July 2, 1970. This involves not only increased river basin planning requirements but potentially a complete reversal of Federal policy on industrial wastes in municipal systems regarding eligibility determinations.

It is estimated that the Commonwealth of Massachusetts will have to pay roughly \$3 million and it will take about 5 to 10 years to fully comply with the new river basin planning requirements. In addition, this means we may have to double the size of the agency in order to produce the necessary reports that have to be made.

These new regulations covering the handling of

Thomas McMahon

industrial wastes by municipalities will undoubtedly slow the State's accelerated program down. It is my understanding that since July 2, 1970, when the new rules and regulations went into effect, the Federal Water Quality Administration has not furnished the States with any explanation or guidelines on how the new policies are to be interpreted. If the State cannot understand the new Federal policy, how do the small Massachusetts town officials and communities expect to understand the complicated State and Federal requirements and at the same time proceed with an accelerated program to construct the urgently needed wastewater treatment plants in this State?

I would like to point out that the preliminary planning of the needed wastewater treatment facilities on the Merrimack River has been completed and most communities are in the final planning stages at the present time. The final planning includes in most instances the treatment of industrial wastes jointly with municipal wastes. For the Federal government, State government, and local government to become involved in complicated cost recovery systems with industries at this time in the program undoubtedly again will seriously delay the start of construction. Municipal officials and industry are presently negotiating on this matter, and I believe they can work out equitable agreements.

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It is still the responsibility of municipalities and sewer districts to operate and maintain the treatment facilities and to raise money for this purpose. The Federal program under the Federal Water Pollution Control Act is primarily, or ostensibly I should say, for the purpose of providing technical services and financial aid to States and municipalities. For the Federal government to become involved in the operation and maintenance of every sewerage system in the country is in my opinion uncalled for and not in accordance with the intent of Congress.

In conclusion, I would implore your leaders in Washington to reassess the potential impact of changing the Federal construction grants program at a time when simplicity and progress are so important. Clean waters will only be attained by a consistent, timely, well-engineered construction program for municipalities and industries throughout the nation.

Thank you.

MR. KLASHMAN: Thank you, Mr. McMahon. I am sure your statement will be noted by those of our people in Washington who are concerned.

Mr. McMahon, could I get something clarified? In your statement, is it possible for the State, in your opinion, to participate in a project treating industrial

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wastes completely? I mean 100 percent industrial?

MR. McMAHON: I would say it could happen. It probably would not happen, in the sense that I doubt that you could comply with all 7 of those requirements.

We do have 1 particular project in the State at the present time that will be handling almost 100 percent industrial waste but will be taking in a small school and has a possibility of taking in an additional community in the future.

Again, the criteria of all those 7 points were satisfied in this project. The project was delivered to your office. It was generally concurred in by your people.

The only saving grace I would say under this new proposed regulation is that you gave the approval to the project based on the current rules and regulations, and if they change, this might possibly affect the eligibility determination at a later date.

I think you know which project I am talking about.

MR. KLASHMAN: Yes.

Mr. Healy, do you have any comments?

MR. HEALY: I think, by and large, we operate within the same framework that Mr. McMahon has been describing -- the point being now any instances where the primary thrust of the project is to treat industrial waste.



We do have at least 1 that comes to mind in our State where the plant is largely devoted to the collection and treatment of industrial wastes. This, however, does not mean that the industry was without some substantial cost in achieving this type of solution. There were many in-plant changes. The total cost of this project was about \$4.5 million, and industry had to spend in the neighborhood of \$2 million on its own to accommodate to that type of an arrangement.

So we too are very much interested in maintaining a program which will allow industry to look to the municipality for the solution of its waste treatment needs. We have ample evidence in our State that where an industry goes its own way, the level of efficiency in treating the wastes is much lower than it would be were the municipality in charge.

The industry normally is interested in making a profit, producing a product, and it isn't especially interested or skilled in treating industrial wastes.

So, again, we hope that this change in regulation and apparently a change in policy the Federal government will not preclude a continued arrangement such as we have been talking about here.

MR. KLASHMAN: Thank you, Mr. Healy.

Mr. Peloquin?

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MR. PELOQUIN: I just want to commend Mr. McMahon for his statement. This is something that has been talked about among the States, and I am glad to see that he has brought it forth and advised the public as to what is developing, as I think automatically this is going to lead to a delay in the overall program in the immediate future.

MR. KLASHMAN: Thank you, Mr. Peloquin.

I think I would just like to say a word about the regulation having to do with industrial wastes. What the regulation says fundamentally is that in the case of those industries who are discharging to a municipal system where they might affect the treatment process, there must be pre-treatment.

Second, and I think we all agree on this, there must be equitable cost sharing both for the capital costs and for the maintenance and operating costs. What we have found is that in many cases the bonding houses are insisting, where an industry is a substantial part of the load going to a municipal system, they must have some type of contract to insure the integrity, the financial integrity, of that project.

I do hope that there will be some clarification of some of the points that you have raised in the very near future.

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Go ahead.

MR. HEALY: Mr. Chairman, could I inquire is it your understanding that the Federal agency will now become party to rate schedules or a review agency to consider rate schedules which an industry or, rather, which a community might develop in connection with any industry that it might be supplying treatment?

MR. KLASHMAN: I think that we will review this, but I cannot conceive of, for example, in your State or in the State of Massachusetts -- I have worked with both of you for many years -- our questioning a schedule that appeared acceptable to you people.

This would happen I suppose, but I can't conceive of it.

MR. HEALY: Actually, we do not in New Hampshire review the rate schedules that the community might develop. We have a variety of methods used, and a municipality is given wide latitude in selecting any combination that it feels is workable in its particular situation.

We have indicated too in our comments when the regulations were in the formative stage that this method we felt was sensible and reasonable.

One thing that might help is the State guarantee feature that New Hampshire has had for several years,

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because we haven't had this question raised as to the ability of the industry to meet its obligations.

The State on a full-faith basis guarantees the bonds for the municipality. And if the industry, unfortunately, fails, then the State has assumed that risk or will pick up that risk.

So maybe this might be a means.

MR. KLASHMAN: I can't answer your question specifically, Mr. Healy. I am familiar with your situation, but I don't know whether this will be --

MR. HEALY: It seems to me that this would be a better or certainly a more desirable way of allowing the communities to maintain the flexible arrangements they have had in the past for meeting their own problems. Certainly we have ours, and we shouldn't be invading their areas.

MR. KLASHMAN: Mr. Healy, I would suggest that you might want to submit this, if you have not already done so, so that we can get a ruling on the interpretation of the regulation. Because this is a legal problem that is beyond my --

MR. HEALY: It will appear in the record, and I hope it would be --

MR. KLASHMAN: We'll work this out later.

MR. HEALY: Fine.

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MR. PELOQUIN: Mr. Chairman, I would like for the record to clarify the fact that Mr. McMahon's comment extended beyond the industrial waste problem. His reference to the basin planning aspect is far more extensive than just the industry-municipal situation.

I have a preliminary draft issued by Washington here which is a 34-page document on requirements to qualify for a grant, and apparently we have until 1973 to prepare total plans. And it would take almost that much time in one basin to get all the information that is being required now.

It is not just the industrial complex. It is the whole basin complex.

MR. KLASHMAN: I don't want to take any more time here, Mr. Peloquin, to debate the merits of the new regulation. We are here to discuss the progress on the Merrimack. But I will merely state that the law, the Federal Water Pollution Control Act as amended, very specifically states that to be eligible for a construction grant a project must be part of a comprehensive plan. And the administration in implementing that part of the law has issued this regulation.

So if you have any questions about this, I would suggest that this is not the proper place to discuss it.

MR. McMAHON: Mr. Chairman, I would just like to



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comment a little bit, briefly, on that, and then we can go on to other business.

My purpose for bringing this subject up this morning was not merely to come in and criticize a particular rulemaking that the Federal government has adopted. It was, in fact, designed to point out to the Federal government that in the future, unless there is a reasonable and liberal interpretation of this rule and regulation, this can have a marked impact on the progress in the river basins in Massachusetts that we are about to talk about today. I should like to make that quite clear.

MR. KLASHMAN: Your point is noted.

We would like to now move on, gentlemen, to the consideration of the implementation schedules. What I would like to propose is that we review each of these and, where possible, have a report on the progress that is being made.

MR. McMAHON: Mr. Chairman, I think probably in order to save a little bit of time it might be better if I could call on John Casazza, who is the supervising sanitary engineer in the Division of Water Pollution Control, to give a status report on the projects that are the subject of this conference.

John Casazza

STATEMENT BY

JOHN CASAZZA

SUPERVISING SANITARY ENGINEER

DIVISION OF WATER POLLUTION CONTROL

COMMONWEALTH OF MASSACHUSETTS

MR. CASAZZA: Mr. Chairman, I am John B. Casazza, Supervising Sanitary Engineer, Division of Water Pollution Control.

This is a status report on the Nashua, Concord, Shawsheen, and Merrimack River Basins.

The municipalities and industrial firms in the overall Merrimack River Basin and its tributaries have given the fullest cooperation, and there has been good progress in implementing the Division's water pollution control program.

Several municipal and industrial waste treatment facilities are under construction, and some are nearing completion.

The status of the program for the major rivers is as follows:

Concord River

A total of 15 implementation letters have been sent out to the municipalities and industries in this area. All recipients have indicated that they will voluntarily comply with our schedules. To date, 8 reports and preliminary

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plans have been received and approved by the Division. Of the 8, 3 have submitted final plans, 2 are now in our office awaiting Division approval, and construction has started on 3 projects. And 4 polluters who were originally notified are now no longer polluting.

In the basin, we do have 5 polluters that are behind schedule, with some reason.

The town of Hudson is behind, but they have submitted a grant application and it is awaiting Federal approval.

The town of Marlborough, while behind, has already started construction on its westerly plant and has submitted plans for its easterly plant.

The Treble Cove Shopping Plaza up here in Billerica is going to eliminate their discharge by putting in sub-surface disposal facilities, and these plans have been submitted to the State Department of Public Health for approval.

The North Billerica Company will be connecting to the municipal system, and the company is awaiting approval of the town and is negotiating with the town to tie into the municipal system.

Likewise, the Roxbury Carpet Company is going to connect to the municipal system, and they too are awaiting approval from the municipality.

In this basin we have projects costing

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approximately \$2.7 million that money has been appropriated for. Of this, \$2.6 million is eligible for Federal and State aid.

In the Merrimack River Basin we have a total of 49 industries, 1 district, and 15 municipalities, 5 of which have multiple construction projects. That means that the pollution abatement program is broken down into several phases.

Of the 70 pollution abatement projects in the overall valley, 19 are to construct their own treatment facilities, and 12 of the projects are dependent upon construction of municipal facilities, with 13 additional projects having plans to tie into the municipal facility when it is completed.

In general, in the Merrimack River Basin itself, most of the municipal facilities, as Mr. McMahon has indicated, have already completed their preliminary planning, and, in general, the industrial concerns along the river are planning to tie in or have already tied in or have been tied in for a number of years to the municipal system.

So with the progress on the municipal level, we will see a great deal of improvement in the overall pollution abatement picture in the whole river.

We have estimated that communities along the river

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now have appropriated funds amounting to a total of approximately \$80 million. This is a lot of money. And plans are on the drawing boards. When these projects get under way, I think we will see a big change in the valley.

As you know, coming downriver, the town of Chelmsford has appropriated its money, and its construction plans are nearing completion.

The city of Lowell has completed its preliminary planning and has accepted a grant from the State for the preparation of final plans and specifications for its waste treatment facility.

The town of Dracut, unfortunately, we had to go to court with, and they are now under a court decree to proceed with their pollution abatement program.

The city of Lowell has been very cooperative with our Division and has indicated time and time again that they are willing to take in Dracut and the town of Tewksbury should they ever decide to come into the system. The Lowell system is being designed with this possibility in mind.

However, the town of Dracut is under court order but now has hired its engineers and is proceeding with its program.

The city of Haverhill has appropriated somewhere in the neighborhood of \$12 million, over \$12 million, for its



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treatment plant and is in the process of selecting a consulting engineer to proceed with the final plans and specifications.

The one big industry in the city of Haverhill, the Continental Can Company, has submitted a contract to the city for going into the city system. The other industries in this community are going to go into the municipal system, some with pretreatment, and some will be going in without the necessity of putting in pretreatment facilities.

I would like to digress for a moment. I know yesterday a lot of questions came up about pretreatment, etc. We do in this State have a requirement that before the money is given or before the plant is completed the municipality must adopt adequate rules and regulations governing the discharge of industrial waste into their system. We have a suggested ordinance which we hand out to them for their consideration. But we do say in certain instances, "You might want to amend these or change these to meet a certain situation within a given community."

But before any grant is now given in the State, this is mandatory that they do have proper ordinances to protect not only the sewerage system but the treatment plant itself.

Now, in this line, after a community has its

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consulting engineer, is proceeding with its final plans, our Industrial Waste Section in the State confers with these engineers. Our people, their engineers, and the city officials go over the industrial waste industries in the town, and at this time they decide which have to be pretreated and which do not.

The city of Lawrence has, as you know, joined in a region with the towns of Andover, North Andover, and Methuen. The district has already appropriated funds for projects totaling over \$30 million. Their engineers are now in the process of preparing these plans.

The town of Merrimac, unfortunately, is also one of these communities where we had to go into court. They are under court decree. But they did comply with the court decree, hired their consulting engineer, and their final plans are nearing completion.

The city of Newburyport, of course, is the only community on the river that has a municipal waste treatment plant. We have requested that they start their planning for the construction of a secondary waste treatment facility, and they are now negotiating with the consulting engineers, or I believe they have already hired a consulting engineer, to prepare a report on their needs for secondary treatment in the town.

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The consulting engineers for the town of Amesbury are now in the process of preparing final plans and specifications for a waste treatment facility. The town of Amesbury had a great deal of trouble and a great deal of delay in their program in coming up with a site for the location of their treatment facility. They finally did find a site that was acceptable to both the State and all of the various factions within the community.

The town of Salisbury is under order from our Division to proceed with its program. They have completed their proposal report, and we have been waiting now for some time to get a determination on eligibility from the Federal government.

Under the Nashua River, upstream we have the city of Fitchburg which has appropriated a considerable sum of \$12 million or more for 2 municipal waste treatment facilities. Because of the nature of the industrial waste coming into the municipal system, it has been necessary for their consulting engineers to do a pilot plant study. This plant study is nearing completion, and we hope that this project will be allowed to continue.

The town of South Lancaster -- of Lancaster -- has formed a pollution abatement district and just since last week has appropriated somewhere over \$2 million for its

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pollution abatement program. They have engineers who will now be beginning to work on the design of the needed works.

I believe their intent is to discharge the wastes from this district to the MDC facility located in Clinton.

For the town of Pepperell, their engineering reports were submitted to us for approval. However, the total cost of the project to the town was, in their opinion, too high, and so now there has been an attempt to revise the project and, while abating pollution, nevertheless, to not have such an expensive facility at the onset.

They have also indicated that they do not intend to take the industrial waste into their particular system.

The only other town downstream that we have any question on is the town of Ayer. They have a secondary waste treatment facility. Our only concern with them is that they provide adequate chlorination, and this has not been effected at the present time.

On the Shawsheen River, we expect that when the Lawrence district plant is constructed the Ballardville waste treatment facility will be abandoned.

I believe that is the general summary of the status of our program along the river. We have a few industrial concerns that are on our implementation schedule here that I have not bothered to go into. There are a few that are

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behind, but, in general, most of our people are either moving or else we have had them in and they are now under orders to proceed.

MR. KLASHMAN: Mr. Healy, do you have any questions of Mr. Casazza?

MR. HEALY: No.

MR. KLASHMAN: Mr. McMahon?

MR. McMAHON: I would like to make just one comment. That is, in the area of enforcement, whenever any industrial or municipal discharger does get behind schedule, we have a particular procedure that we have used in the past. That is the one of consent orders or holding an adjudicatory hearing. This is done routinely.

Recent amendments to the Massachusetts Clean Waters Act also allow the Division now to issue an order directly -- that is, without an adjudicatory hearing beforehand. It does allow for a 30-day appeal period for a hearing.

We feel that this will more than likely streamline any of the normal lag period that you might encounter in dealing with municipalities or industries just by virtue of the requirements of the State Administrative Procedures Act.

So this is a step in the right direction, and, hopefully, it will accelerate the program even more.



MR. KLASHMAN: Mr. Peloquin?

MR. PELOQUIN: No questions.

MR. KLASHMAN: Mr. Fitzpatrick?

MR. FITZPATRICK: The only thing I would raise is I think we would like to go over some of these in detail in order to establish dates as we go down the line on all of these.

MR. CASAZZA: Mr. Klashman, I have a more detailed status report listing all of these dates. Each polluter has certain dates for completing certain phases of his projects. I have a detailed status report of each and every one of these industries that we have on our implementation schedule.

This lists the dates of the court orders. It lists the dates of our orders, where changes have been made since our last submission to you at the conference 2 years ago.

MR. KLASHMAN: Do you have that available now?

MR. CASAZZA: Yes.

MR. FITZPATRICK: We have a copy of this with us, and we still have a number of questions.

MR. McMAHON: Excuse me, Mr. Chairman. I think we could probably waste a lot of time this morning and bore a lot of people with a lot of very small, what I would call

inconsequential problems that could have been solved actually behind -- well, I won't say "closed doors" -- could be put right out in the open if we could go into the office and take a look at the records.

I think it would simplify the procedures here if within the next 30 days the Federal people came to our office or we would furnish this information in detail.

I know we are going to get bogged down with a lot of questions on different phases of different projects, and I don't think that really is the intention of this meeting here this morning.

We have a number of people who would like to make presentations, and I would suggest that we proceed with that. We will furnish you any information that you need in as much detail as you need.

MR. KLASHMAN: Well, within the next 30 days, then, Mr. McNahon, if you could furnish us the dates when the preliminary plans were prepared -- you indicated that most of these have been done -- or if they have not been done, when they will be done; the date when you are holding the community to completion of their final plans; the appropriation of funds; the start of construction date; and the date that the facility will actually be in operation. If you will furnish us all of these within 30 days for all of the

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communities and industries in the basin that have separate discharges, this is what we need.

MR. McMAHON: I will be happy to provide anything that you don't have. I don't particularly see any value in going through the whole schedule all over again. Your people have been in my office almost every other week for the last 2-1/2 years. If they are not up to date, it's not our recordkeeping.

MR. KLASHMAN: We don't have some of the dates.

MR. McMAHON: Okay. Whatever you don't have we will be happy to furnish.

MR. KLASHMAN: We would like to ask Mr. Casazza a few questions for the record.

You said that there are some industries that are behind schedule in your statement.

MR. CASAZZA: That's right.

MR. KLASHMAN: Do you have a list of these?

MR. CASAZZA: That is shown on this listing that I gave you people a copy of yesterday.

MR. KLASHMAN: Could you --

MR. CASAZZA: Of the dates.

MR. KLASHMAN: Could you just read them off?

MR. CASAZZA: Do we have that where I could pick them out readily, Mr. Slagle? Do you know?

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MR. WILLIAM A. SLAGLE, JR. (Chief, Enforcement Section, Massachusetts Division of Water Pollution Control): It would mean going right down the schedule you have there that you referred to, to see if they are behind.

MR. KLASHMAN: Are there a number of them behind or just a few?

MR. CASAZZA: Yes, there are several behind. For example, a lot of them are going-- We schedule them to abate their pollution by a certain date. They are going to go into the municipal system. The municipality is behind and so, therefore, --

MR. KLASHMAN: The question I'm really asking, Mr. Casazza, is: Are there any industries that are not going into municipal systems or have not agreed to do so?

Mr. Casazza, would it be better if we called on another speaker while you --

MR. CASAZZA: I think so, because, as I said, this is a big, long document, many pages, and it is just a question of going down and digging these things out.

MR. KLASHMAN: If you could just pinpoint those, it would be helpful, and we can call you back later.

MR. CASAZZA: Okay. That would be very good.

MR. KLASHMAN: Before you leave, just one other question. On some of the major communities, do you have

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readily available the schedule dates for Framingham, Lowell, Lawrence, and Haverhill? I mean could you just give us that off your list as to where we stand?

MR. CASAZZA: Yes. For example, that list I gave you lists Framingham, and we give you the dates on that list.

MR. KLASHMAN: Could you give them to us? Could you let us know what these dates are?

For example, the preliminary plans on that are completely done? Right?

MR. CASAZZA: That's right. Well, take Framingham, for example. They have already appropriated funds, etc.

MR. KLASHMAN: When was that done?

MR. CASAZZA: I guess 1968. We have two projects here. One is the Saxonville pumping station reinforcement. The final plans of those things were approved on 9/9/70, and they are to start construction this month. We hope that the thing will be completed in February 1971.

The other project is another interceptor. They have submitted their final plans to us, and we have scheduled construction to be completed in July of 1971.

MR. KLASHMAN: When will the construction start on that?

MR. CASAZZA: Well, of course, they have submitted the final plans to us, and we can't anticipate when the



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construction is going to start until we get back to them.

But, anyhow, they have submitted final plans. We do still call for them to complete construction next July.

So sometime between now and August-- I mean in the very near future when the plans are approved. I don't know what the exact detail of the holdup is. So until the matter of these plans which have been submitted to us in June has been resolved, I can't very readily say when they will start.

MR. KLASHMAN: We will be able to get a date within the next 30 days?

MR. CASAZZA: Right. We will give you a date.

MR. KLASHMAN: What about Lowell? When do you expect --

MR. CASAZZA: Well, you see, here in Lowell it was just 2 days ago that the city of Lowell accepted a State grant for the advanced final planning. They are negotiating now with their consulting engineer for a contract. We have reviewed the contract and found that it is okay. And on the basis of that they went ahead and signed the agreement. We offered them the money.

But their contract calls for completion of these final plans and specs in 600 days, so we have not yet-- This is something that has just been done yesterday.

MR. KLASHMAN: What is the status of the

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appropriation of funds for them?

MR. CASAZZA: They appropriated \$17 million. They have got their money.

MR. KLASHMAN: When was that done on the appropriation of funds?

MR. CASAZZA: That was done a year ago. October 1969.

MR. KLASHMAN: July of 1969?

MR. CASAZZA: It was done a year ago. The city of Lowell appropriated funds in I guess it was October 1969. Right.

MR. KLASHMAN: And the final plans will be ready in about what?

MR. CASAZZA: Say 2 years.

MR. KLASHMAN: 600 days from --

MR. CASAZZA: Right, although they have indicated in discussions that they are going to be broken down in several phases of the thing. We hope part of the construction, like site preparation, will be started well ahead of those 600 days.

MR. KLASHMAN: Well, in other words, it will be in 22 months, so that is October of-- I beg your pardon.

MR. CASAZZA: By 2 years, in 1972, it will be under construction.

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MR. KLASHMAN: Yes, but the final plans will be ready in --

MR. FITZPATRICK: Mr. Casazza, is Lowell going as a municipality or as a district?

MR. CASAZZA: Their report, their preliminary report, which was approved by us and approved by the planning people in the area, etc., makes provision for going regional. So that any town that wishes to go in, the system is sized adequately. The volume of waste is such that the interceptors, etc., coming over from Dracut-- It has all been taken care of in their initial phase.

And the treatment plant has been laid out so that if there is additional-- If they want to come in, it's all right. They are going to add units as time goes on.

MR. FITZPATRICK: Well, the reason I ask this is if they go as a district, if the project goes as a district, does this require approval of the General Court in Massachusetts?

MR. CASAZZA: No.

MR. FITZPATRICK: It doesn't?

MR. CASAZZA: No. They can do it 2 or 3 ways. I think what they will do now, where Lowell has already started-- Our laws which we had changed a year ago will allow Lowell to contract with these towns, and these towns

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will enter into contract. Up until a year ago, 1 town could only contract with another town for a period of 1 year, which was no good for this, so the law was changed to allow an extended period of time -- I think 40 years -- to contract, for the life of the treatment plant.

MR. FITZPATRICK: If the other towns came in -- I think you indicated Dracut and perhaps Tewksbury -- this would not serve to delay the project?

MR. CASAZZA: Not one iota, no. The whole thing has been laid out with this in mind.

MR. KLASHMAN: On Lowell, then, as I understand it, the plans and specifications will be done in 20 months, which would be about June 1972.

MR. CASAZZA: Right.

MR. KLASHMAN: And the construction will start --

MR. CASAZZA: I am sure some of it will have started prior to June 1972, because in engineering final plans and specs, some will come out long before June 1972, and as each one comes out, they will-- Like site work will come out maybe early, and they will start immediately.

MR. KLASHMAN: In other words, then, construction will start about April 1971?

MR. CASAZZA: You can anticipate at least no later than 600 days.

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MR. KLASHMAN: When do you expect these two projects to be done?

MR. CASAZZA: Well, the first project I am sure is going to take more than 2 years or so to construct.

MR. KLASHMAN: That will be April 1973 then?

MR. CASAZZA: Yes, I think that's a good figure for this first phase.

MR. KLASHMAN: Is that what you have on your list? As I understand it, the first project will be done April 1973 and the second one April 1975.

MR. CASAZZA: Right. We have listed here the project will be completed in 1973.

MR. KLASHMAN: And the second one?

MR. CASAZZA: Until the other day when the city of Lowell-- Here's another point. We have been waiting for about 5 months to get an eligibility determination from the levels as to what is eligible, what isn't, within the project itself. Until we could get all these things straightened out, until we get straightened out about all of these things, we could not say where we are going to go from there. We don't know when we can put on a date for completion.

This money was just assigned and agreed to just two days ago. This (indicating document) was prepared prior to



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that.

Our original plan called for Lowell to have their construction completed by April of 1973. It is, of course, realized this is not possible to do now because it's such a massive project.

MR. KLASHMAN: What do you anticipate the date will be?

MR. CASAZZA: Usually on these big projects consulting engineers have indicated at least 2 years.

Mr. Greeley, how long do you figure that a project the magnitude of Lowell will take?

MR. RICHARD F. GREELEY (Chief, Construction Grants, Massachusetts Division of Water Pollution Control): It would take about 2 years to get the treatment plant under construction, and I would say it would take the treatment plant probably 2 years to construct, so we are about 4 years away.

MR. CASAZZA: Mr. Greeley is chief of the construction grants program.

MR. KLASHMAN: So what you are saying is it would be October 1974? Is that correct?

MR. CASAZZA: Yes.

MR. KLASHMAN: Four years?

MR. CASAZZA: Yes.

MR. KLASHMAN: Do I understand correctly that the industries, the Ames Textile, Byfield Felting, Commodore Foods, Conant Houghton Division, Jean Alan Products, Lawrence Manufacturing Company, Middlesex Westfield Spinning, Pellon Corporation, Robinson Top Yarn and Dye, and Vertipile, Inc., all will start construction for their connections to the city system in June of 1971? Is that correct?

MR. CASAZZA: After the final plans start to get laid out, there may be some changes in the exact location where the interceptor is going to be, and upon where that goes depends when the industries are going to start.

But I believe right now once Lowell has got started, as I have indicated before, our people will be getting further into the picture with the industries in the town. And the industries, now that they know this thing is firmed up, and knowing where the interceptor is going to go, will start doing their in-plant changeover if so necessary. There may be some already tied into the sewer.

MR. KLASHMAN: But these will definitely be under treatment by October 1974?

MR. CASAZZA: By the time the treatment plant is put into operation, these industries will have been tied in.

MR. KLASHMAN: That will be October 1974?

MR. CASAZZA: Right.

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MR. KLASHMAN: What about Suffolk Knitting? Are there --

MR. McMAHON: Mr. Chairman, I think again we are kind of getting bogged down in something that I agreed 15 minutes ago to furnish you within 30 days in any kind of detail that you request.

I think in the interest of many of the people who are here who would like to speak, why don't we proceed with this, and if you can tell us exactly what you want, we will furnish you the information.

MR. KLASHMAN: Very well, Mr. McMahon.

Mr. Casazza, while we are hearing these other speakers that Mr. McMahon is going to call on, if you can give us the names of these industries that are behind, we will call you back. We would appreciate it.

MR. CASAZZA: Right.

MR. KLASHMAN: Thank you.

We will then proceed, Mr. McMahon, with the people you wish to call, with the understanding that you will give us the detailed dates within 30 days.

MR. McMAHON: Right.

I have 6 registration records here of people who have indicated a desire to speak. The first one is Michael Lesko with the St. Regis Paper Company in Pepperell.

Michael Lesko

STATEMENT BY

MICHAEL LESKO

TECHNICAL SUPERINTENDENT

ST. REGIS PAPER COMPANY

EAST PEPPERELL, MASSACHUSETTS

MR. LESKO: I am going to read from a prepared letter that is addressed to the Federal Water Pollution Control Administration, and it goes as follows:

"Gentlemen:

"The following is a status report and time table for pollution abatement at St. Regis Co., East Pepperell, Mass.;

- "1. Complete Construction Drawings-December 31, 1970
- "2. Start Construction by -March 15, 1971
- "3. Complete Construction by -November 30, 1971
- "4. Facilities Required - Equivalent Secondary Treatment

"This time table is in agreement with a consent order issued by the Commonwealth of Massachusetts Water Resources Commission on June 4, 1970.

"We are presently on target for meeting these dates. Malcolm Pirnie Engineers, White Plains, New

Michael Lesko

York and St. Regis Corporate Engineering are drawing the final construction plans to be submitted December 31, 1970."

MR. McMAHON: Thank you, Mr. Lesko.

MR. KLASHMAN: As I understand it, then, this project will be several months behind the May schedule that was originally submitted.

MR. McMAHON: Yes. These are the dates that have been established under consent order. Again, I refer you back to our administrative procedures in dealing with municipalities or industries that get behind schedule. In most cases we try to compress the schedule, but usually if a date is missed this means that the time of the engineering report may be coming in later.

We do shoot for trying to keep the construction dates the same if at all possible. This can't be done in all instances, but it has been done in a number of cases.

MR. KLASHMAN: Do I understand correctly the completion-of-construction date was moved ahead 9 months but the completion of the facility was moved ahead only 6 months?

MR. McMAHON: I don't have the record. I assume what you are saying is correct.

MR. KLASHMAN: The original date was March 1970 for the drawings and May 1971 for complete construction, so



Michael Lesko  
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it is 9 and 6 months, respectively.

MR. McMAHON: Yes.

MR. KLASHMAN: Thank you.

Does anybody have any questions of Mr. Lesko?

MR. PELOQUIN: No questions.

MR. FITZPATRICK: No questions.

MR. KLASHMAN: Mr. Healy?

MR. HEALY: None.

MR. McMAHON: I would like to call on Mr.

Frank E. Pendleton, Jr., process engineer with the Fitchburg  
Paper Company.

STATEMENT BY

FRANK E. PENDLETON, JR.

PROCESS ENGINEER

FITCHBURG PAPER COMPANY

FITCHBURG, MASSACHUSETTS

MR. PENDLETON: I shall read from a few notes a  
very brief statement.

Fitchburg Paper Company, which is located in  
Fitchburg, Massachusetts, on the Nashua River, is participating  
in a program for the abatement of water pollution of the  
Nashua River. This program consists of joint treatment of  
municipal and industrial waste in the city of Fitchburg and

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some of the surrounding towns.

Engineering plans are nearly completed, and construction is scheduled for start in 1971, pending approval of the plans, with the completion date of 1974. The plans call for a secondary treatment of all wastewater.

Fitchburg Paper Company endorses this plan as being the quickest, most effective and feasible method of eliminating pollution on our section of the Nashua River.

Thank you.

MR. McMAHON: Thank you, Mr. Pendleton.

MR. FITZPATRICK: Sir, if I understand you correctly, you are going to be going into a Fitchburg municipal plant with the wastes from the Fitchburg Paper Company?

MR. PENDLETON: That's correct.

MR. FITZPATRICK: Do you know at this time about or do you have any schedule for pretreatment of your wastes before these go into the municipal system?

MR. PENDLETON: Pretreatment is not necessary as these plans are drawn.

MR. FITZPATRICK: Oh, I see. At this time, as far as you are concerned, the raw wastes from Fitchburg Paper are going into the Fitchburg municipal system for complete treatment?

MR. PENDLETON: This is correct.

## Frank Pendleton

MR. KLASHMAN: Mr. Healy?

MR. HEALY: No questions.

MR. KLASHMAN: Mr. Peloquin?

MR. PELOQUIN: No questions.

MR. KLASHMAN: What type of operation does Fitchburg Paper have?

MR. PENDLETON: We are classified as a fine-paper manufacturing concern. We are a non-integrated mill; in other words, we do not make our own pulp. We buy our pulp and process it into paper.

MR. KLASHMAN: So that the wastes fundamentally are merely solid fines?

MR. PENDLETON: Suspended solids. Some BOD. It is low compared to, say, a municipal plant.

MR. KLASHMAN: And there are no toxic materials of any kind?

MR. PENDLETON: No.

MR. HEALY: White water.

MR. PENDLETON: White water, if you are familiar with that.

MR. KLASHMAN: Thank you very much.

MR. McMAHON: Just to clarify one point, this was the project we alluded to earlier. This is a project which is a joint project which will take in both the Weyerhaeuser

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Paper Company and the Fitchburg Paper Company. It is a municipal project. It will also be taking in the school and has a capability of taking in a surrounding town.

In the early days of this plant it will be primarily handling industrial wastes. This is the plant that was deemed eligible earlier in the game by the Federal government and has complied with the 7 requirements of the State.

This is, we think, one of the better comprehensive programs in the State for the city of Fitchburg, and it does include a plant that will carry significant amounts of industrial waste both now and in the future.

I think the big question here -- and this came in my earlier presentation -- is this is a project that we want made eligible for Federal aid. It is eligible for State aid, and it should be made eligible for Federal aid.

MR. KLASHMAN: Thank you.

MR. McMAHON: I would like to now call on Mr. Peter Hughes who is an environmental engineer with the Weyerhaeuser Paper Company in Fitchburg, Massachusetts.

Peter Hughes

STATEMENT BY

PETER HUGHES

ENVIRONMENTAL ENGINEER

WEYERHAEUSER COMPANY, PAPER DIVISION

FITCHBURG, MASSACHUSETTS

MR. HUGHES: Thank you very much, Tom. I have a very brief statement, handwritten.

Weyerhaeuser Company wishes to go on record in support of the present State program for abatement of pollution in the Nashua River. The schedule as set forth by the Water Pollution Control Division is realistic, in our opinion, and will most certainly accomplish the job of cleaning up the Nashua River in a reasonable period of time.

Weyerhaeuser strongly urges that this program, along with its timetable and proposed funding levels, remain in effect to prevent any further delays in the cleanup of the river.

Thank you.

MR. McMAHON: Thank you, Peter.

MR. KLASHMAN: Do I understand that the dates for Weyerhaeuser are the same as for Fitchburg, which means that the plans were done in December of 1969 and that the construction will be completed in April of 1972? Is this correct?



## Peter Hughes

MR. HUGHES: Our present timetable is commensurate with the municipality and the other major industries in Fitchburg.

MR. KLASHMAN: What is the time schedule?

MR. HUGHES: We are anticipating start of construction in the spring of 1971 -- that is, this coming spring.

MR. KLASHMAN: Which would be March of 1971? March or April of 1971?

MR. HUGHES: I don't know that the exact month was defined, but in the spring of 1971.

MR. KLASHMAN: Yes.

MR. HUGHES: And completion of construction by 1974.

MR. KLASHMAN: When in 1974?

MR. HUGHES: I don't know again. I don't recall the exact month. But I assume by mid-1974, with hopefully some partial treatment prior to that time.

MR. KLASHMAN: And the final plans and specs on that are done?

MR. HUGHES: The preliminary engineering report has been completed and approved, and the final plans are in the process of being completed at this time.

MR. KLASHMAN: When will those be done? Do you

Peter Hughes

know?

MR. HUGHES: I believe they will be done around the first of the year.

MR. KLASHMAN: About January of 1971?

MR. HUGHES: Yes.

MR. KLASHMAN: And those dates, then, apply not only to you but to the Fitchburg Paper Company? Those dates apply to you and the Fitchburg Paper Company?

MR. HUGHES: That is correct.

MR. KLASHMAN: Thank you very much.

Does anybody have questions?

Mr. Peloquin?

MR. PELOQUIN: No.

MR. KLASHMAN: Mr. Fitzpatrick?

MR. FITZPATRICK: I would raise the same question we did with the Fitchburg Paper Company. I know you have had a pilot plant study. I don't know whether this is complete. But is there any indication at this time you will be pre-treating before you discharge the wastes from Weyerhaeuser into the municipal plant?

MR. HUGHES: Again, our particular waste is compatible with conventional treatment methods, and we anticipate no pretreatment, as we do not have any toxic materials or materials that would pose a problem to the proposed treatment

Peter Hughes

system.

MR. FITZPATRICK: So your operation would be the same as the Fitchburg Paper Company's, in that essentially your raw waste from Weyerhaeuser would be going directly to the municipal plant for treatment?

MR. HUGHES: Yes. That is correct.

MR. FITZPATRICK: Thank you.

MR. McMAHON: The next gentleman I would like to call on is Lieutenant Edward S. Rizzotto, Fort Devens, Massachusetts.

Lieutenant Rizzotto.

LIEUTENANT EDWARD S. RIZZOTTO (Assistant DFAE, Fort Devens (USA), Fort Devens, Massachusetts): There was sort of a mistake. I don't intend to make a statement. I wasn't aware completely of the format for the meeting, and I don't have a statement at this time.

I would like to wait until later and maybe ask questions of people after they have made their presentations.

MR. McMAHON: Certainly.

MR. KLASHMAN: I am afraid that conference procedure does not permit you to ask questions. But if you do have some, if you will speak to Mr. Fitzpatrick about that, we will work something out.

MR. McMAHON: The next gentleman is Mr. John J. Monteiro, who is Chairman of the Greater Lawrence Water

John Monteiro

Pollution Committee, Central Merrimack Regional Commission,  
in North Andover.

Mr. Monteiro, I hope I read that right

STATEMENT BY

JOHN J. MONTEIRO

CHAIRMAN, CENTRAL MERRIMACK REGIONAL PLANNING COMMISSION  
NORTH ANDOVER, MASSACHUSETTS

MR. MONTEIRO: I am John J. Monteiro, Chairman  
of the Central Merrimack Regional Planning Commission. I  
am also a member of the Planning Board of North Andover and  
representing North Andover at this time and also Chairman  
of Pollution Abatement of the Greater Lawrence area.

I do not have any particular statement to make  
at this time except to tell Chairman Klashman that we are  
doing the best we can in regard to the pollution of the  
Merrimack River. We are attaining our schedule as pre-  
scheduled in the last two years, and at this time we feel  
that the Central Merrimack Regional Planning Commission is  
staying on top of more of the cities and towns in our region  
in compliance to your regulations and also that the  
Greater Lawrence Sanitary District has been established and  
we are progressing in a manner and according to the dates  
prescribed by the State.

John Monteiro

I would like to say at this time to Mr. Klashman one of the main, particular areas which the people of the Central Merrimack Region are more concerned with is the money factor, the expenditure of money, the Federal participation in this particular program.

One of the main questions which arises as far as the Central Merrimack Regional Commission is concerned is that we have a 2- or 3-year program on a water and sewer program plan and study which we will establish sometime in the early part of next year in conjunction with the pollution abatement of the Merrimack River from the point of the city of Lawrence to the Salisbury area.

I would like to say at this time we realize much of the compensation received is specified on the 50 and the 30 percent State and Federal financing.

One question that arises at this time is that if we are credited by the HUD requirements as far as water and sewer plan and program is concerned, whether or not we become eligible for what they call the 5 percent bonus element as far as the financing on these projects within the area of the region.

This is a vital question to us at this time because this is an added feature. We expect to spend close to \$60,000 or \$70,000 in the next year or 2 to be accredited



John Monteiro

under the water and sewer program for our area, and it certainly would behoove us to have this 5 percent bonus given to us in regard to any implementation of the pollution abatement programs of the Central Merrimack regional planning area.

That is one of our big questions at this time, Mr. Klashman.

MR. KLASHMAN: I hope that this can be solved very soon.

Are there any questions, Mr. Healy?

MR. HEALY: No.

MR. KLASHMAN: Mr. McMahon?

MR. McMAHON: John, I really don't think that is a problem. Given the fact that the Greater Lawrence Sanitary District is going to be a regional treatment facility -- I can't speak for HUD; this is a Federal agency -- but I certainly would see no problem in getting the 10 percent of the Federal grant, which would make the Federal share 55 percent, and 25 percent State, making a total of 80 percent Federal and State contribution.

MR. MONTEIRO: Oh, is that the proportion at this time?

MR. McMAHON: Yes.

MR. MONTEIRO: I was under the impression it was 50

John Monteiro

and 30, and then the 5 percent which would give us the 85 percent.

MR. McMAHON: No, it is 50, 25, and then 10 percent of the Federal grant if you qualify under the HUD program.

As far as the money at the Federal level, I am sure Mr. Klashman can speak with more authority than I. I would like to point out that at the present time the Commonwealth of Massachusetts has roughly 2 bond issue authorizations. The first one was \$150 million, and the second one passed last year is \$250 million. This also includes a prefinancing clause so that if there is not enough Federal money available at the time you wish to come in for grants, the State would be prefinancing the Federal share.

So I really don't think you have to look forward to a real problem with financing at all. We certainly hope the Federal government will come up with the total amount for the State without prefinancing.

MR. MONTEIRO: At this time I would like to thank Mr. Klashman and Mr. McMahon and Mr. Casazza for their fine cooperation. I worked with these gentlemen the last 6 years and with Mr. Yasi at different times. I think from the Lawrence to the Salisbury areas we are combining and cooperating in every endeavor to make the pollution abatement of the Merrimack River at that point be in conjunction with the

John Monteiro

Federal regulations as far as the water program is concerned.

Thank you very much.

MR. KLASHMAN: Just one moment.

Mr. Peloquin?

MR. PELOQUIN: No questions.

MR. KLASHMAN: Mr. Fitzpatrick?

MR. FITZPATRICK. Yes. Sir, I don't know whether you can speak for the Greater Lawrence Sewage District or not, but if you can, I have several questions regarding it.

MR. ROY E. COOMBS, JR. (Department Head, Western Electric, North Andover, Massachusetts, and Member, Greater Lawrence Sanitary District): I am a member of the Greater Lawrence Sanitary Commission and could speak for the district.

MR. MONTEIRO: Unfortunately, I am not a member of the sanitary district.

MR. KLASHMAN: Excuse me. Just for the record, would you identify yourself, please?

MR. COOMBS: Roy Coombs, the representative from the town of Andover on the Greater Lawrence Sanitary District.

MR. KLASHMAN: We will call on Mr. Coombs later then if that is all right with you, Mr. McMahon.

MR. McMAHON: If he wishes to make a statement.

Mrs. Hugh Stoddart

MR. KLASHMAN: We will call on you later, Mr.

Coombs. Thank you.

Thank you.

MR. MONTEIRO: Thank you very much.

MR. McMAHON: I would like to call on Mrs. Hugh F. Stoddart at this time. She is coordinator of the Nashua River Clean Up Committee.

For people here who don't know her -- and I'm sure that most of you do -- she has been quite a driving force in the Nashua River Basin for many years. She has worked with Mayor Flynn in Fitchburg and with the paper companies in Fitchburg and with the consulting engineers for the town. They have come up with what we consider one of the best comprehensive schemes for a large community in the Commonwealth of Massachusetts.

We really can't say enough about Mrs. Stoddart. She has done a wonderful job. She has gone on to bigger and better things, but she still retains an outstanding interest in pollution of the Nashua River.

Mrs. Stoddart.

Mrs. Hugh Stoddart

STATEMENT BY

MRS. HUGH F. STODDART

COORDINATOR, NASHUA RIVER CLEAN UP COMMITTEE

GROTON, MASSACHUSETTS

MRS. STODDART: Mr. Chairman, Conferees representing the State of New Hampshire, the Commonwealth of Massachusetts, the New England Interstate Water Pollution Control Commission, and the United States Department of the Interior: I am Mrs. Hugh F. Stoddart, coordinator of the Nashua River Clean Up Committee. I represent the 155,000 people in the Nashua River watershed who want the maximum number of uses for the Nashua River attained as expeditiously as possible.

I want to thank Mr. Thomas McMahon, Director of the Division of Water Pollution Control, and Mr. Lester Klashman, Regional Director of the Federal Water Quality Administration, for permitting me to attend this workshop session to present a statement for the majority of residents in the Nashua River watershed.

We are generally pleased with the progress that has been made in Massachusetts to abate the pollution in the Nashua River in accordance with the 1967-1972 5-year implementation schedule. We are also generally pleased with the cooperation that the Division of Water Pollution



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Control has given polluters to help them meet their schedules.

However, we are concerned that most of the polluters are now running about 1 year behind schedule. We are most anxious that this schedule not be further delayed and that all polluters move rapidly ahead to correct their abuses in the original time scheduled.

Most polluters could move more expeditiously if they felt that the State demanded this of them. We think that the State would demand more of them if they had a larger staff and if the Attorney General's office had the ability to process noncompliance cases more quickly.

At present, if a polluter is brought to trial for noncompliance (which may take several months or a year), and if the judge finds against the polluter, the polluter may be granted a considerable amount of time (3 years in the case of Merrimac) to complete what may only be a few months' work.

To speed up the pollution abatement process, we would like to suggest that State and Federal governments (the primacy resting with the State) have the power to construct and operate wastewater treatment facilities wherever a polluter fails to comply with his schedule, and that that polluter then be required to pay for the facility's

construction and operating cost.

This idea is not original with the Nashua River Clean Up Committee. We understand there is a similar program in operation in the State of New York and in the State of Maryland.

I will review, briefly, the progress of pollution abatement in the towns and cities along the Nashua River, starting at the headwaters of the North Nashua River in Westminster, and moving downstream.

We regret that the Old Mill Restaurant and Advanced Coatings failed to comply willingly with their schedules. On the other hand, we are glad that the State has brought consent orders against both of these polluters and that both polluters are now taking the necessary steps to treat their wastes.

In the case of Fitchburg, we believe that the city and its industries, with the help of their engineering firm, have done their share to stay on schedule. In fact, we would like to particularly commend the Honorable William G. Flynn, Mayor of Fitchburg, for his leadership and work to abate pollution in that city. Fitchburg has appropriated \$17.5 million for the construction of their 2 plant facilities.

Because of the extensive State and Federal red

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tape involved in approving the city's plans, and because of a shortage of staff to negotiate the red tape, there have been some minor delays in approval. There has been another delay in completing the final plan due to the necessity and desirability of having the pilot plant operate for a year in order to design better wastewater treatment facilities. We feel that this time will pay off in terms of better designed facilities.

We are pleased that the Division of Water Pollution Control granted Camp, Dresser and McKee, their consulting engineering firm, \$163,000 to develop this research and demonstration plant, and that the city of Fitchburg was awarded \$663,500 to develop their final plans.

We are also greatly pleased that the New England Regional Commission has made \$368,000 available to Fitchburg to begin separating their combined storm and sewage system.

We are anxious for additional monies to be made available from this fund for the Nashua River model river basin demonstration project so that work might be undertaken that could not otherwise be done, and so that innovative techniques for the cleanup of the river might be initiated.

We are greatly concerned about the Secretary of the Interior approving the plans for the construction of

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the West Fitchburg treatment plant. There has been a great deal of discussion about this plant not being eligible for full Federal funding under the new rules and regulations because it is being primarily designed to take care of industrial waste.

We very much hope that the Secretary of the Interior will interpret these rules and regulations so that the West Fitchburg treatment plant will receive the promised 50 to 55 percent Federal financial assistance. Otherwise, the job will only be partially done. It would be grossly unfair to all of us in this watershed if the rules and regulations were changed 3/4 of the way across the stream and we were left stranded in our pollution abatement efforts.

We are also pleased with the kind of treatment -- activated charcoal -- that the engineering firm has proposed for the West Fitchburg treatment plant. It is possible that the effluent from this plant will be of such good quality that it can be recycled by the industries and that this would then permit additional water to be let down from existing reservoirs to help augment the flow in the river. The efficiency of this treatment would be to greatly benefit all people -- particularly those people who live downstream. Everyone would gain.

We hope that both State and Federal agencies will



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do all that they can to assure that this West Fitchburg treatment plant is built on schedule and that it provides the finest kind of treatment.

In Leominster, we are pleased that Foster Grant and Borden Chemical Companies, both under consent orders, have taken the necessary steps to tie in with the city's old treatment plant. We are also pleased that the city of Leominster has voted money to rehabilitate the old plant and to install chlorinating facilities in the new plant, but we regret that this work has not yet been done.

In the case of Atlantic Union College, we regret that so much time was expended in getting the Lancaster Sewage District formed and the construction money appropriated. We do recognize the legal and legislative complexities involved. We now expect planning and construction to move rapidly ahead.

On the South Branch, at the Metropolitan District Commission's Clinton sewage treatment plant, we are disturbed that required chlorinating facilities have not yet been placed into operation. We hope that the Attorney General's office will quickly reach an opinion as to whose responsibility it is to install these facilities, MDC's or Clinton's, so that the responsible agency may proceed quickly to correct this abuse.



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In Clinton, we are also concerned that the promised flow of water (wasted -- their term) into the Nashua River from the MDC Wachusett Reservoir is reportedly not being met. This cannot help but have an adverse effect on the quality of the water in the South Branch and the main stem.

On the main stem, we are pleased that Ayer has voted to appropriate money for the installation of a chlorinator and that this facility will be in operation by May of 1971.

We are pleased that both paper industries in Groton are on schedule. These companies are not a part of a municipal treatment system and are paying the whole construction costs themselves.

Pepperell and the two companies located in that town, Bemis and St. Regis Paper, got off to a very slow start. Pepperell received a consent order and 4 time extensions. The 2 industries have also received extensions, with St. Regis' extension going beyond the original April 1972 deadline established for the abatement of all pollution in the Nashua River Basin.

These extensions concern us very much. We are anxious that the State give no further extension of time to Pepperell or to its industries and that, instead, these

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polluters be required and assisted to meet the newly established deadlines.

Since the consent order was issued, the town of Pepperell has certainly indicated its interest to comply, but it is having great difficulty determining what is required of them to abate their pollution of the Nashua River, what sewage plans will meet State and Federal pollution abatement and funding requirements, and what will be acceptable and economically feasible for the town of Pepperell. Pepperell needs a lot of help and technical guidance.

We hope that all polluters will be able to complete their planning and construction within their agreed upon deadlines and be fully operational by 1972. At the same time, we hope that the efficiency of the treatment will be so good as to provide a Class B water, a class higher than that agreed upon by the Department of the Interior and the Division of Water Pollution Control in 1967 for the year 1972.

The key to success will be the instant availability of promised State and Federal monies when the municipalities and regions need them to begin construction.

We are most interested to know what the U. S. Corps of Engineers plans for low-flow augmentation are in

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the planned North Nashua River reservoir system. At the second session of this conference, this matter was discussed, and both Chairman Stein and Mr. McMahon indicated their interest in the question and suggested the possibility of the conferees getting together with the Corps to explore the whole question.

Mr. Klashman stated then that the Federal Water Pollution Control Administration had already asked the Corps for stream flow augmentation.

Mr. Stein noted that, "Massachusetts knows the kind of minimum flow we are going to need to ask for or to consider upgrading the classification," and said, "If the Secretary adopts this he will just present this to the Corps and anyone else as part of our Federal operation."

The Nashua River Clean Up Committee recommends that the Corps of Engineers assist communities and/or States to acquire and conserve its flood plains. This may prove less expensive and more beneficial than the Corps building dams.

This then brings up the question about the summary and recommendations of the second conference on the matter of the pollution of the interstate Merrimack-Nashua Rivers and their tributaries. We have not yet seen or received a copy of the summary or the Secretary of the Interior's

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recommendations for the second conference, and we would like to know when copies will be made available.

Also, we would like to know if a summary of this workshop session and recommendations by the Secretary will be made and, if so, when.

We are pleased that the New England Regional Commission and the New England Interstate Water Pollution Control Commission worked together cooperatively this summer to collect information about existing sources of pollution in the Nashua River Basin. We are anxious that this information be produced in a report and distributed to the various agencies responsible for abating the pollution of the river and to agencies developing a comprehensive and coordinated river basin plan.

We hope that the New England River Basins Commission will waste no time in coordinating this program with the other involved agencies and move ahead to make the best use of monies appropriated by the New England Regional Commission for this project. We also hope that the New England Regional Commission will continue to actively promote the Nashua River project by giving it top budgetary and staffing priority.

We hope that an effective monitoring program will be developed in the Nashua River Basin and that whatever



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studies are needed to enhance the quality of the water will be undertaken.

We hope that at the conclusion of the 1972 5-year implementation plan the Commonwealth of Massachusetts will evaluate the standards that have been set for the Nashua River Basin with the idea and the hope of upgrading the classifications of all streams to "B."

Since the second conference of the Merrimack and Nashua Rivers, a new organization has been formed in the Nashua River watershed. It is called the Nashua River Watershed Association and is made up of individual and organizational members from the various communities in the Nashua River watershed. It is really an alliance of the citizens and the industries, the legislators, and our governmental officials to provide conservation goals, to achieve conservation goals.

The primary purposes of the NRWA are to clean up the Nashua River and maintain its good quality, provide a greenway along the whole length of the Nashua River on both sides, save the flood plain and water recharge areas, and protect the tributaries and associated wetlands.

Our greatest goal is to save the land along the river while we are cleaning up the river. We believe that we have only this fleeting moment in time to be successful,



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because once the river is clean, or promises to be clean, we will have lost our opportunity. Then the price of river land will skyrocket, and developers will rush in to satisfy their own personal gain. More development will mean more pollution. The very waters we are all working to clean will be polluted again.

In addition to protecting the river from future pollution, the greenway will provide a scenic river, be suitable for quiet outdoor recreational pursuits, provide a habitat for wildlife, protect water recharge areas, and be a welcome buffer from population pressures. Its whole effect will be to enhance the environment and quality of life in the region, as well as to enhance the economy of the region.

We implore Secretary Hickel and the conferees to help us be successful. Public policy and programs on all governmental levels must be to encourage and support land acquisition for conservation along our riverways while the rivers are still polluted and are being cleaned.

We sincerely hope that the conferees will make this a strong recommendation of the workshop and that Secretary Hickel will support this recommendation wholly as a part of this administration's announced policy to give major consideration to the quality of our environment when

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considering all programs.

For the record, I would like to submit a copy of Nashua River Watershed Association's "Preliminary Greenway Plan." For the record, I would also like to state that the Nashua River Watershed Association has had two professional studies prepared this summer, one entitled "A Plan for the Nashua River Watershed" and the other "The Hydrology and Water Resources of the Nashua River Watershed."

A professional staff member at Fort Devens assisted our environmental planner, landscape architect, and our hydrologist in their preparation of these studies. One of the staff at Fort Devens who is present today, Mr. Rizzotto, is a landscape architect and has been working full time for the Nashua River Watershed Association.

When these two studies have been printed, we would like to make copies available to Secretary Hickel and all of the conferees. We think that these studies and the recommendations included in them will be useful as guides to all planning agencies and will be informative as to what the residents of the Nashua River watershed need and want.

I will not attempt to detail any of the other hopes or requests that the Nashua River Clean Up Committee has for the Nashua River watershed but, instead, will refer you to the statement I presented at the second conference on

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behalf of the Nashua River Clean Up Committee and advise you that our previously stated hopes and requests remain the same.

I find that I must include one other hope, request, and that is that when wastewater treatment facilities are being planned they not be sited next to the river and that their effluent not be dumped directly into the river.

Thank you very much, Mr. Klashman and Mr. McMahon, who has just momentarily left, for permitting me both the opportunity and the time to present my statement to you at this workshop meeting.

I must say I very much enjoy working with both the State and Federal agencies to achieve our common conservation objectives. We have been very pleased with all of the interest and cooperation that our committee has received throughout the watershed in working to achieve our objectives.

MR. KLASHMAN: Mrs. Stoddart, would you just wait a moment?

I want to thank you very much, Mrs. Stoddart, for your usual clear, comprehensive statement.

Mr. Healy, do you have any questions to ask of Mrs. Stoddart?

MR. HEALY: No.

MR. KLASHMAN: Mr. Peloquin?

Mrs. Hugh Stoddart

MR. PELOQUIN: I would like to thank Mrs. Stoddart and the members of her committee for the assistance they have given our field people this summer working in the Nashua-North Nashua Basin. The report is being finalized now, and we expect it will be made available to the regional commission in about 4 weeks.

Our field people are at Fort Devens today on cleanup matters. I am sure they are probably talking to your people there.

I do have one question for clarification. I don't know whether I should address it to Mrs. Stoddart or to Mr. McMahon. But it deals with Foster Grant. You stated in your statement that Foster Grant had taken the necessary steps to tie in with the city's old treatment plant. Our people in the field I think found that Foster Grant had what amounts to a complete treatment facility and I guess the only one in the basin that had complete treatment works for industrial waste and were producing an effluent which apparently was not in need of further treatment. But the ultimate plan is to tie into the municipal system.

They do have a plant in operation, a treatment facility in operation, now, don't they?

MRS. STODDART: It is my understanding, Mr. Peloquin, that they do. My further understanding is they still do



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plan to tie in with the city.

I think that Mr. McMahon is in a much better position to answer that question than I am. I depend mostly upon the Division of Water Pollution Control, or our committee depends mostly upon the Division of Water Pollution Control, for our information. We do not seek to go out into the field to meet with the various polluters to gather our information.

MR. PELOQUIN: Thank you.

MR. McMAHON: As far as the status of Foster Grant, I would like to ask Mr. Slagle, the Chief of our Enforcement Section, to comment on that if he would.

STATEMENT BY

WILLIAM A. SLAGLE, JR.

CHIEF, ENFORCEMENT SECTION

MASSACHUSETTS DIVISION OF WATER POLLUTION CONTROL

MR. SLAGLE: As far as Foster Grant and Borden Chemical both are concerned, pretreatment facilities have been completed. And, as Mr. Peloquin notes, almost complete treatment for Foster Grant has been done.

However, before they can go into the municipal system, there is one portion of the municipal facility which has to be rehabilitated and put back on line. The



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city has appropriated funds to do this, and bids are out for the rehabilitation and refurbishing of this section of the plant which will then permit the two industries to tie into the municipal system.

MR. PELOQUIN: Could I ask you: The quality of the effluent now is such that it is almost complete treatment, isn't it?

MR. SLAGLE: I couldn't answer that. I don't know.

MR. PELOQUIN: This is the impression I have received from talking with the consulting engineer.

MR. SLAGLE: I couldn't answer that phase of it.

MR. PELOQUIN: Thank you.

FURTHER STATEMENT BY

MRS. HUGH STODDART

MR. KLASHMAN: Mrs. Stoddart, I think we have a few more questions.

Mr. Fitzpatrick?

MR. FITZPATRICK: No questions.

MR. KLASHMAN: Mrs. Stoddart, I would just like to first assure you that I will convey your concern about the fact that the summary and recommendations for the second session have not yet been released, and also your concern about when these will be available. I will try to get in touch with

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you and give you some idea of when this will be, what I find out.

Secondly, I would like to ask a question. In your statement you indicated that Pepperell was having great difficulty in determining what is required of them to abate their pollution. Do you know anything about the details of what is bothering them? I am not familiar with the details on this.

MRS. STODDART: Mr. Klashman, I am glad that you have asked me this question, not because I can answer it but because it reminds me that I have brought with me a statement from Mrs. Bruce Holloway in Pepperell to present to you, to be made a part of the meeting today.

What Mrs. Holloway does in her statement is to list chronologically the progress that Pepperell has made to meet its pollution abatement schedule.

Perhaps I could best give this to you and, in giving it to you, tell you that I think you would be much better instructed to ask that question of Mr. McMahon or Mr. Slagle, because they have been meeting with the members of the Board of Selectmen in Pepperell. They know better than I what Pepperell's problems and concerns are.

But I would like to present to you Mrs. Holloway's statement on behalf of the town of Pepperell.

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MR. KLASHMAN: We will place that in the record, Mrs. Stoddart.

Mr. McMahon, would you want to comment on the problem in Pepperell?

MR. McMAHON: Again, I would defer to Mr. Slagle.

MR. SLAGLE: Pepperell has submitted a report to the Division for review. The scope of the work that was envisioned by the consultants for the town had rather a large price tag attached to it. The town is, therefore, rather seriously considering cutting back the scope of the work to get it within something that they feel the town can afford.

They had requested a meeting with the Division to go over this program. It was originally scheduled for this coming Friday, two days from now, but their selectmen were unable to make it, so we are now trying to get all involved to agreement on a new date when we can sit down and see just how much this project can be cut back and still make some sense as far as relieving the pollution emanating from the town into the Nashua River is concerned.

So that this is the status right now, Mr. Klashman, of Pepperell.

MR. KLASHMAN: But did the question of the holdup on the eligibility have to do with a question of the

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collection system not being eligible?

MR. SLAGLE: When we start talking about eligibility, I am getting out of my realm and my field. But I will say this: The original project envisioned by the consultant for the town of Pepperell took in the entire town, and, therefore, certain pipelines were considered interceptors to bring that sewage down to the treatment plant.

However, in cutting back the program, there is a question as to whether they are then interceptors or whether they are part of the collection system, because they don't go out to the far-distant environs of the community.

So that there is this determination. It gets a little sticky and a little complicated, and I don't know the answer myself.

MR. KLASHMAN: I can only state that the question of the eligibility of an interceptor arises often, and I sympathize with the municipality in wanting to get the largest possible grant made to them. However, the law is rather specific in indicating that only interceptors are allowed to be eligible and that the collection system is not eligible.

So we have in this region very carefully attempted

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to define what we mean by an interceptor, and we are limited by what we can participate in.

MR. SLAGLE: I appreciate that, Mr. Klashman. My point is that when a town has a program of this nature in which, say, a 24-inch pipe would be constructed and would be an interceptor in the future to bring sewage down from another area, whereas if it were a part of the collection system they might need only an 8-, 10-, or 12-inch pipe as a part of the collection system, this is where the gray area gets in.

I am sure I don't see any purpose in berating this at this time, but you see the point.

MR. KLASHMAN: Thank you, Mr. Slagle.

Mrs. Stoddart, the statement of Mrs. Holloway will be entered in the record. We will mark it Exhibit A. I would like to mention, however, that there are two maps attached to that exhibit. One of these is marked "Map A," the other "Map No. 4."

The map marked "Map No. 4" is in 2 colors. When it is reproduced in the record, it will only be in 1 color.

(Reporter's Note: The statement of Mrs. Holloway, together with attachments, is included in this record at the conclusion of Mrs. Stoddart's statement.)



Mrs. Hugh Stoddart

MRS. STODDART: Chairman Klashman, in further response to the question that you asked about Pepperell, one of the concerns of Pepperell regarding this proposed treatment facility is that this plan, in the opinion of the Board of Selectmen, will not abate the present pollution to the Nashua River. This is one of the factors that disturbs me very much.

MR. KLASHMAN: I am afraid I don't quite understand you.

MRS. STODDART: Several of the polluters to the Nashua River are located along River Road. I believe that the system that has been proposed does not propose collecting the waste from these dwellings, and the Division of Water Pollution Control has given the town of Pepperell the reasons why they have not proposed a sewer extension to that part of the town.

But, nevertheless, the town of Pepperell is concerned that this proposed system will not abate their pollution, and they had originally thought that they were being required to build this system in order to abate their pollution.

MR. KLASHMAN: Mr. McMahon, do you have any comments?

MR. McMAHON: Well, to synthesize it, I think it is a combination of trying to do a total job that is going to

Mrs. Hugh Stoddart

cost too much money for the town of Pepperell at the present time. I think it is a resolvable situation, and perhaps we shouldn't delve into it too much.

We have had one meeting with the town of Pepperell, and what Mrs. Stoddart has said is correct. There evidently are a couple of small sources of pollution well out of town that would not be covered in the original recommendations of the engineer. This, and coming up with what is a scope of work that will be financially acceptable to the town and still do a satisfactory job in meeting the water quality standards, is essentially what our meetings have been all about. It hasn't been resolved as yet.

I think Mr. Slagle indicated we had a meeting this Friday which had been cancelled. As soon as we can schedule another meeting, we are going to sit down and start all over again.

So I think the problem will be solved. We will work hard on it anyway.

MR. KLASHMAN: Mrs. Stoddart, one other thing. In your statement you made reference to the siting of waste treatment plants. It wasn't clear. I understood you meant insofar as the actual location of the plant. You recommended, as I understand it, that the plant not be directly on the river?

Mrs. Hugh Stoddart

MR. STODDART: Or in the river.

MR. KLASHMAN: What is it?

MRS. STODDART: Or in the river.

MR. KLASHMAN: Now, when you say "in the river," you mean in the flood plain? Is that what you are saying?

MRS. STODDART: Well, I was being a little facetious. But there is a treatment plant that is proposed that is presently in what was part of a bed of the river. And we would propose that a treatment plant not be built right next to the river, in the river, next to the river, or in the flood plain.

MR. KLASHMAN: We quite agree it shouldn't be in the river. Where is this plant that is being proposed in the river?

MRS. STODDART: This is in Fitchburg.

MR. KLASHMAN: We will look into this further with the State authorities.

Mr. McMahon, do you have any comments?

MR. McMAHON: I wasn't aware that it was actually in the river. It is adjacent to the river, but I didn't really realize it was in the river.

Let's put it this way. I am sure that the plant as presented by the consultant engineer is going to be an adequate plant, do a good job, and it will not affect the

Mrs. Hugh Stoddart

flows in the river.

I know, Mrs. Stoddart, in your new organization you are quite interested in preserving your green belts along the river, and, as such, I think this can be taken into consideration by engineers designing future sewage treatment plants. I think it is probably a very good idea. I think in the case of Fitchburg this is probably so far along that I doubt there will be any change in sites. I am sure you are aware of that.

MRS. STODDART: Yes, I am aware of that. This is located really adjacent now to the Whitman River. The area was dammed, and it was under water. It is no longer under water, and it would be adjacent to the present Whitman River.

MR. KLASHMAN: We are, of course, very much concerned about the flood protection aspects for the project, and we will look into this, Mrs. Stoddart.

MRS. STODDART: Thank you.

STATEMENT BY

MRS. BRUCE HOLLOWAY

NASHUA RIVER WATERSHED ASSOCIATION

STEERING COMMITTEE MEMBER FOR PEPPERELL

(The prepared statement of Mrs. Holloway follows:)



United States Department of the Interior  
Federal Water Pollution Control Administration

223

New England Interstate Water Pollution Control Commission

STATEMENT: Submitted at the second session of the Federal and State Conference  
on Pollution of the Merrimack and Nashua Rivers October 21, 22, 1970

SUBJECT: A chronological report on the status of the Pepperell, Massachusetts  
pollution abatement program.\*

January 1970      Consent orders were received by the selectmen from  
the Massachusetts Division of Water Pollution  
Control for missing the implementation deadline  
for submitting a preliminary plan for a sewage  
treatment facility.

February/  
March 1970      The engineers Preliminary Report, although dated  
January 1970, was received from the firm of  
Whitman & Howard, Inc. in March. The Planning  
Board, Board of Health, and Selectmen spent  
these months studying the proposed plan.  
(See map A)

April 7, 1970      A meeting was held in Boston by the Massachusetts  
Division of Water Pollution Control to discuss  
the proposed Phase 1 sewage plan. Members of the  
Pepperell Board of Selectmen, Board of Health,  
our State Representative, Whitman & Howard's  
project engineer, Director of the Massachusetts  
Division of Water Pollution Control and their  
engineer and staff members were in attendance.

Subjects discussed:

1. Pepperell officials were desirous of a list  
of individual polluters of the Nashua River and  
its tributaries.

The project engineer and the Massachusetts  
Division of Water Pollution Control felt this  
a police action not within the realm of this  
report.

2. Pepperell felt that proposed \$2,900,000. Phase 1  
too expensive for the town in light of the fact  
that there are only approximately 5,000 people  
in the town (most of whom would not be served by  
this system) and that the system would accommodate  
only the municipal and industrial domestic sewage...  
the industrial waste would not be included for  
treatment in this plan.

The Massachusetts Division of Water Pollution  
Control agreed to subdividing Phase 1 into  
stages for financial reasons.

3. Pepperell was granted an extension on the  
implementation schedule to give the Selectmen  
and the project engineer time to subdivide Phase 1  
of the Preliminary plan and come up with an  
acceptable solution.

\*Information compiled from correspondence in the files of the Board of  
Selectmen's office Pepperell, Massachusetts

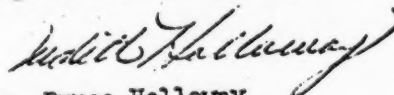


- April 15, 1970 Letter sent to the Massachusetts Division of Water Pollution Control by Pepperell Selectmen requesting an extension of the implementation schedule to July 1, 1970. Reason: to give the Master Plan Study Committee time to study the sewage phase of the Master Plan currently under study this year.
- April 16, 1970 Pepperell Planning Board in a letter requests a 90 day extension from HUD for the Master Planner to study the sewage proposal report of Whitman & Howard, Inc.
- April 21, 1970 HUD replies to Planning Board letter of April 16 and grants an extension from April 24, 1970 to July 24, 1970.
- April 22, 1970 Massachusetts Division of Water Pollution Control in a letter grants the selectmen's request for an extension of the implementation schedule to July 1, 1970 with the understanding that a meeting will be set up between the Town of Pepperell, and Whitman & Howard for the purpose of subdividing Phase 1, after which this proposal will be sent to the Massachusetts Division of Water Pollution Control.
- June 22, 1970 A letter sent from Whitman & Howard to the Selectmen includes two scaled down versions of the original Phase 1 proposal. (see map #1 & 2)  
Version 1 - Estimated cost to the Town \$708,000.  
Version 2 - Estimated cost to the Town \$498,000.  
Both plans are based on the 80% eligibility reimbursement factor for each scheme.
- July 10, 1970 A letter sent from the Selectmen to Whitman & Howard suggests a scaled down version of Phase 1 which the Selectmen feel will be economically acceptable to the Town.
- July 17, 1970 Whitman & Howard replies to Selectmen's letter of July 10 with scaled down version of Phase 1 to be submitted to the Massachusetts Division of Water Pollution Control for approval.
- July 21, 1970 Whitman & Howard in a letter to the Massachusetts Division of Water Pollution Control submit the scaled down version of Phase 1 with an estimated cost to the town of \$270,000. (see map # 3)
- July 22, 1970 In a letter to HUD the Pepperell Planning Board requests a 30 day extension to file the preliminary planning document with HUD.
- July 24, 1970 HUD in a letter to the Pepperell Planning Board grants an extension from July 24, 1970 to August 24, 1970.

- August 19, 1970 The Planning Board in a letter to HUD requests a 60 day extension because the Massachusetts Division of Water Pollution Control has raised questions to the proposed scaled down version of Phase 1.
- August 26, 1970 In a letter from HUD to the Planning Board an extension was granted from August 24, 1970 to October 24, 1970.
- September 2, 1970 In a letter to the Selectmen from the Massachusetts Division of Water Pollution Control the state indicates it will review and either pass or reject the proposal for the Whitman and Howard scaled down version of Phase 1 as soon as the Selectmen request it.
- September 10, 1970 Whitman & Howard and the Selectmen meet and agree to send the scaled down version of Phase 1 to the Massachusetts Division of Water Pollution Control for approval.
- September 15, 1970 In a letter from the Selectmen to the Massachusetts Division of Water Pollution Control the Selectmen request an eligibility meeting to determine what parts of the plan will be available for State and Federal funding. (see map #4)

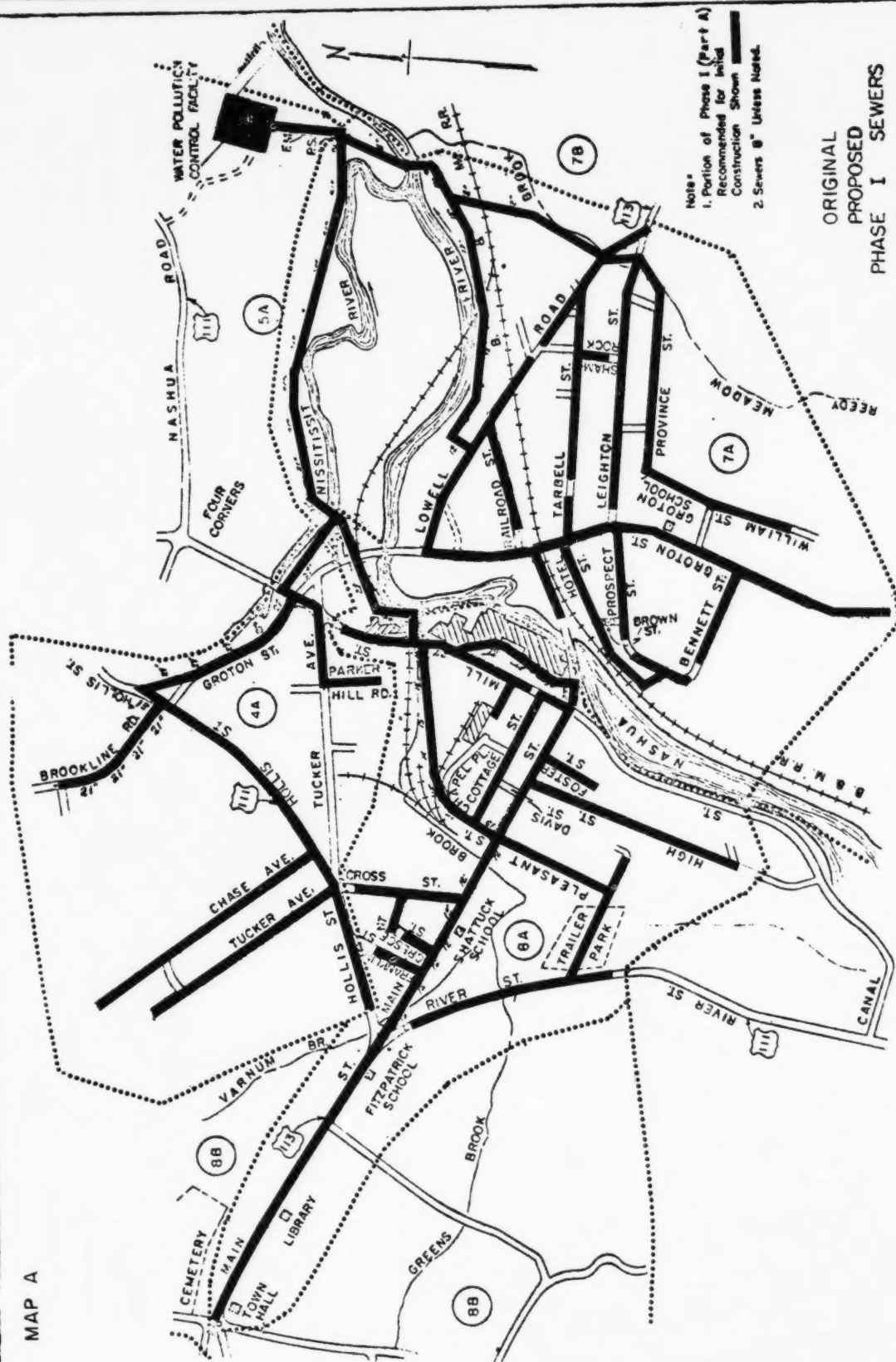
I am submitting this statement of progress report in the hope that the officials present will understand the effort being made by the Town of Pepperell in trying to arrive at a financially-acceptable plan that will abate Pepperell's pollution of the Nashua River.

Respectfully submitted,



Mrs. Bruce Holloway  
Nashua River Watershed Association  
Steering Committee Member for Pepperell

MAP A



**LEGEND**  
 Pipe Sewer ———  
 Drainage Area (dashed line)  
 Force Main (thick solid line)

Scale in Feet  
 0 200 400 600 800

226

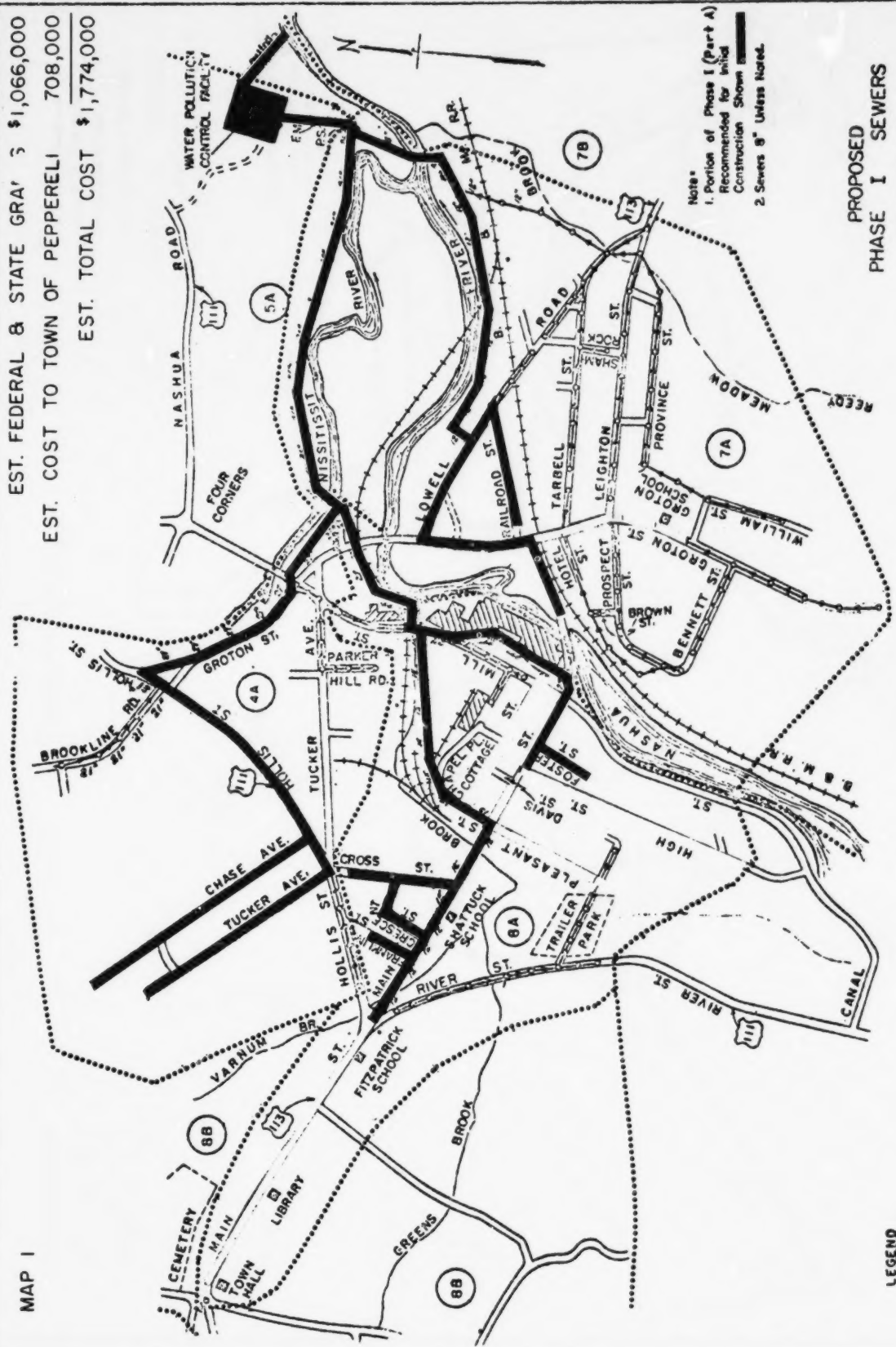
**ORIGINAL  
 PROPOSED  
 PHASE I SEWERS  
 PEPPERELL, MASS.**

DECEMBER, 1969  
 Whitman & Howard, Inc.  
 Engineers & Architects

**Note:**  
 1. Portion of Phase I (Part A)  
 Recommended for Initial  
 Construction Shown  
 2. Sewers 8" Unless Noted.

EST. FEDERAL & STATE GRA' \$ 1,066,000  
 EST. COST TO TOWN OF PEPPERELI 708,000  
 EST. TOTAL COST \$ 1,774,000

MAP I



PROPOSED  
 PHASE I SEWERS  
 PEPPERELL, MASS.

DECEMBER, 1969  
 Whitman & Howard, Inc.  
 Engineers & Architects

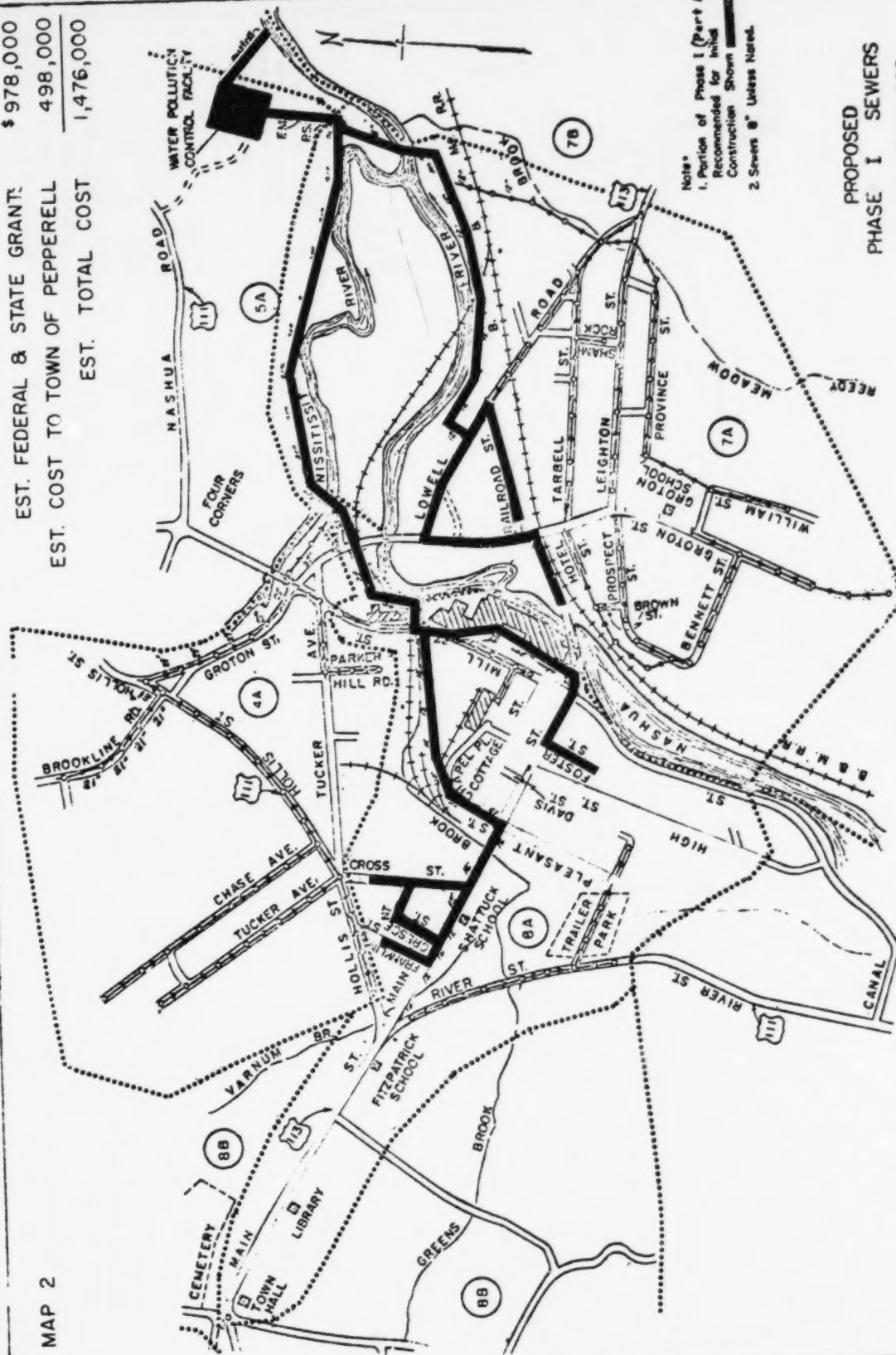


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EST. FEDERAL & STATE GRANT: \$ 978,000  
EST. COST TO TOWN OF PEPPERELL 498,000  
EST. TOTAL COST 1,476,000

MAP 2



Note:  
1. Portion of Phase I (Part A)  
Recommended for Initial  
Construction Shown  
2. Sewers 8" Unless Noted.

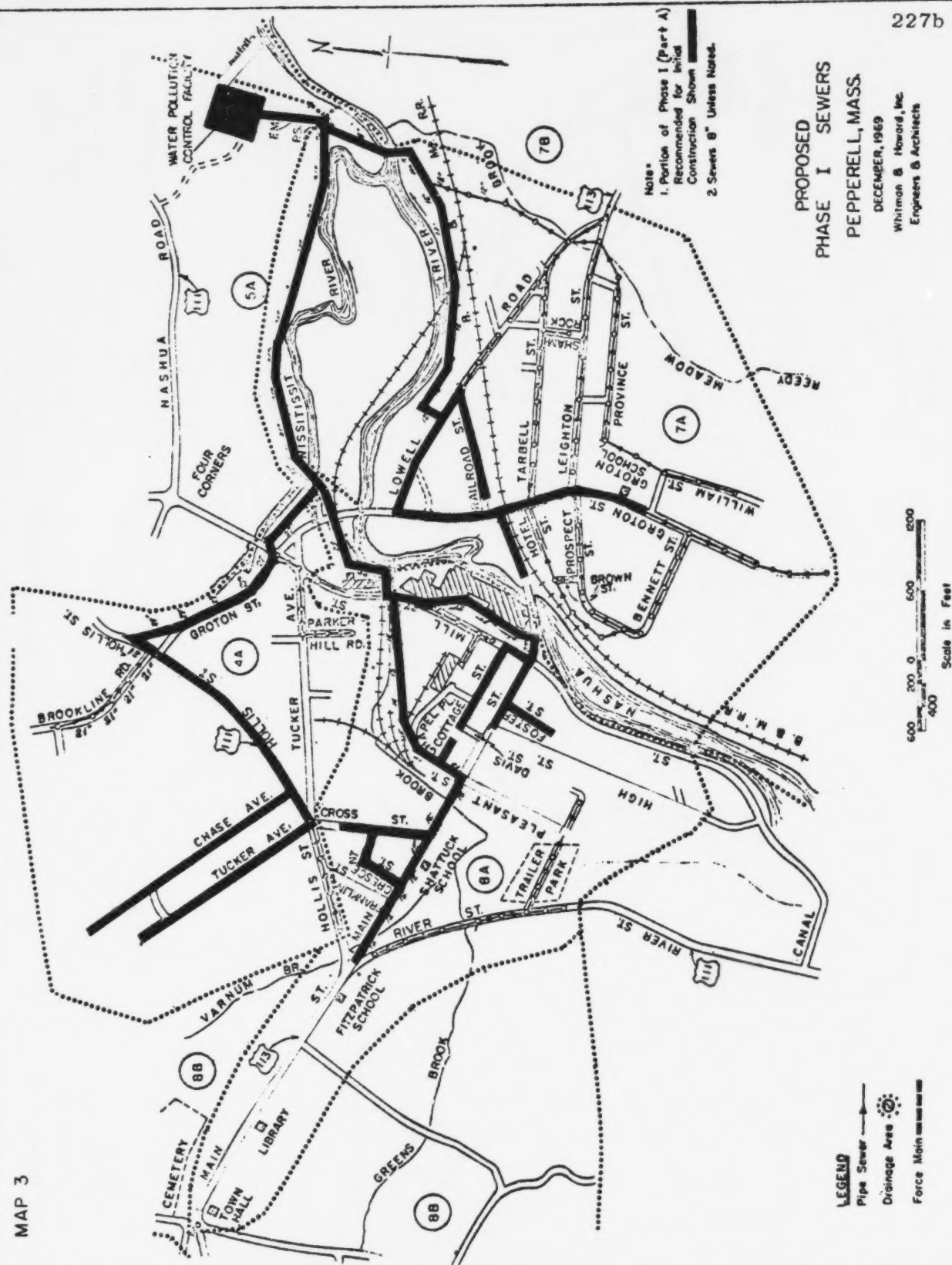
PROPOSED  
PHASE I SEWERS  
PEPPERELL, MASS.

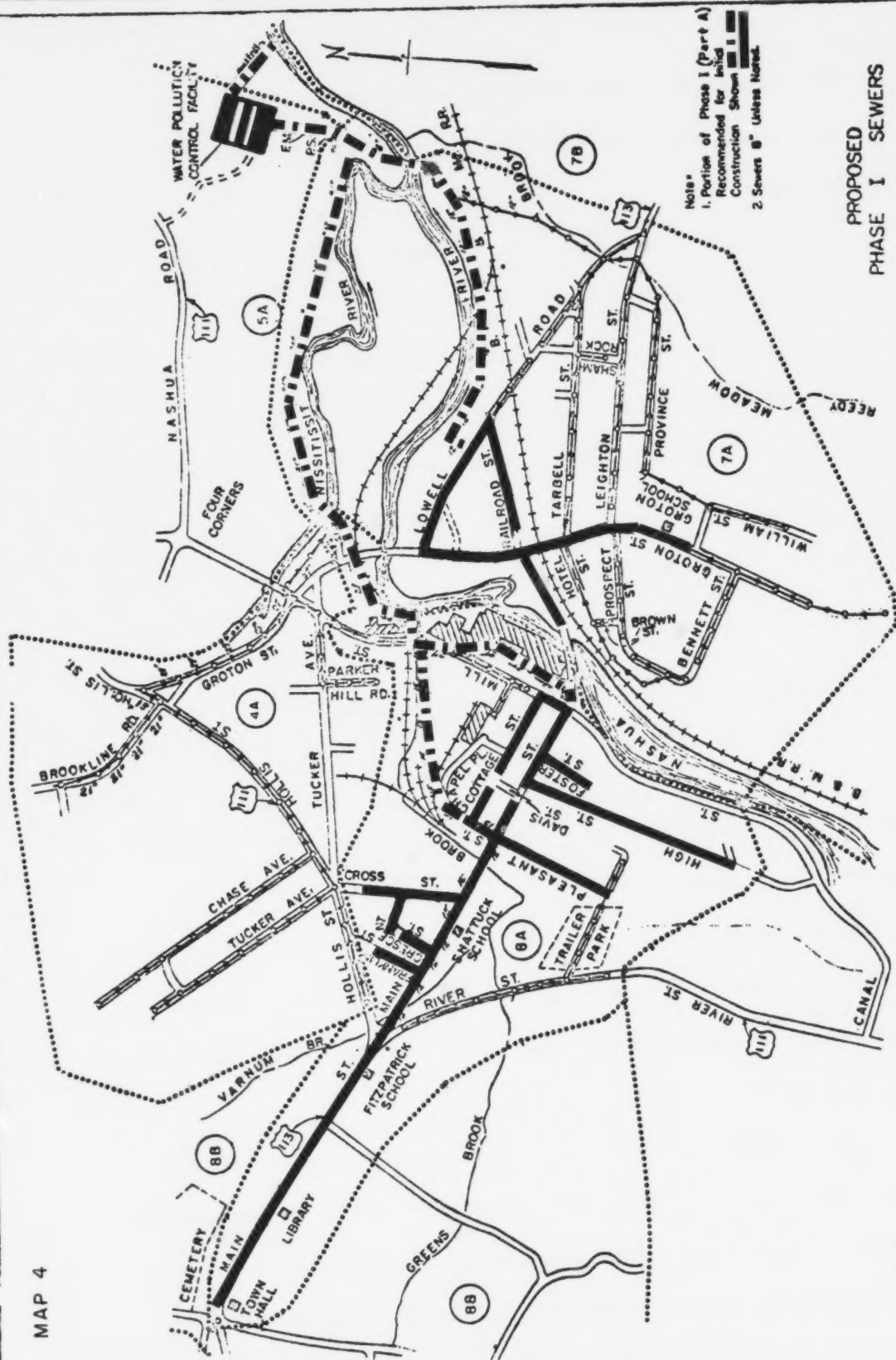
DECEMBER, 1969  
Whitman & Howard, Inc.  
Engineers & Architects

LEGEND  
Pipe Sewer  
Drainage Area  
Force Main



MAP 3





**LEGEND**  
 Pipe Sewer  
 Drainage Area  
 Force Main

600 200 0 600 1000  
 Scale in Feet

**PROPOSED  
 PHASE I SEWERS  
 PEPPERELL, MASS.**

DECEMBER, 1969  
 Whitman & Howard, Inc.  
 Engineers & Architects

Note:  
 1. Portion of Phase I (Part A)  
 Recommended for initial  
 Construction Shown  
 2. Sewers 8" Unless Noted

Roy Coombs, Jr.

MR. KLASHMAN: Mr. McMahon.

MR. McMAHON: Mr. Chairman, I am out of registration records here.

Well, wait a minute. Mr. Coombs, would you like to make a presentation?

MR. COOMBS: I have no presentation to make.

MR. KLASHMAN: You said you would be willing to answer some questions, Mr. Coombs. Would you like to come up to the microphone?

STATEMENT BY

ROY E. COOMBS, JR.

MEMBER, GREATER LAWRENCE SANITARY DISTRICT

LAWRENCE, MASSACHUSETTS

MR. KLASHMAN: Mr. Fitzpatrick, do you want to ask Mr. Coombs a question?

MR. FITZPATRICK: Yes, sir. My understanding is that in the Greater Lawrence District there are two projects which are known as Municipal 1 and Municipal 2. What do these projects consist of?

MR. COOMBS: One has to do with interceptors on the river and picking up effluent from what would be the north side of the river. The other one has to do with the municipal waste treatment plant itself in North Andover and

Roy Coombs, Jr.

the interceptors on the south side of the river feeding that.

MR. FITZPATRICK: I see. Are they in the order 1 and 2 as you mentioned? In other words, is the first one you mentioned No. 1?

MR. COOMBS: This is in the report of Camp, Dresser and McKee. Rather than take the time --

MR. FITZPATRICK: Essentially, they both involve interceptors and treatment?

MR. COOMBS: One is mainly interceptors, and the other is interceptors and waste treatment plants.

MR. FITZPATRICK: Is it true that preliminary plans have been completed for both of these projects?

MR. COOMBS: Based on the Camp, Dresser and McKee report of 1965.

MR. FITZPATRICK: I see. And funds have been appropriated for both or for one of these projects?

MR. COOMBS: Funds have been appropriated for both.

MR. FITZPATRICK: Fine.

With regard to the different towns that are going to be part of this district, or cities, I understand that there are a number of communities other than Lawrence that are involved in the district, and what I wondered was what sort of a commitment, insofar as you know, has been made by these communities in terms of the district. Is it a legal



Roy Coombs, Jr.  
John Casazza

commitment? Or is there a possibility that a town may decide to withdraw at a later time?

MR. COOMBS: The district is set up under Chapter 750, I believe, of the General Laws of the Commonwealth and has legal status that the towns must recognize now.

MR. FITZPATRICK: I see. That's all the questions I have.

MR. KLASHMAN: Thank you very much, Mr. Coombs.  
Is Mr. Casazza back?

FURTHER STATEMENT BY

JOHN B. CASAZZA

MR. KLASHMAN: Mr. Casazza, I wonder if you could answer the question I asked. In your statement you indicated there were a number of industries that are behind. I asked you to name them.

MR. CASAZZA: Yes. I have indicated before we have a very good program going on the river, and the industrial concerns as well as the municipalities have moved along very well with us.

Now, of course, we have gotten behind time on some of our dates. For example, when we became established in 1966 and sent out implementation schedules in 1967, we had to send out these schedules to the individual communities



John Casazza

telling these individual communities to hire their engineers, etc.

At the same time, we were very anxious to have certain of these areas regionalize. We have worked to this end. But in order to do this we had to call these several communities together, and this has taken a number of years to overcome all the various political and institutional constraints and finally get these people together, to agree to form a district.

But the original dates which we had submitted were sent out to the individual communities. At the same time we sent these dates out to the individual communities, we also sent out dates to the industries. While we were working for a regional plan, many of these dates became antiquated. The industries fell behind.

We timed the industrial work to coincide with the municipalities. Where we couldn't get the district formed or it took time to get the district formed, naturally the industrial dates would fall behind as the municipalities did.

But out of the whole big Merrimack River Basin I find that we have about 41 industries that are behind schedule. Going down the list of the 41, 24 of these industries are behind simply because there is no municipal interceptor for them to tie into. They have been committed to

John Casazza

be taken into the municipal system when the municipal system becomes available. So there are 24 of the 41 that are behind schedule simply because they are waiting for the sewer.

Some of these people have to do some pretreatment, it is true, but here again, as I explained earlier, as the individual communities move on their programs, they adopt sewer ordinances. And until such time as these ordinances are adopted, it is quite difficult for the industrial concerns to proceed with their pretreatment, because their pretreatment is based upon what the ordinances are going to say.

So some of these places, while pretreatment is required, have not started on some of their pretreatment work simply because of the lack of information.

But, in any event, all of these places will have their pretreatment in and they will be tied into the sewer at the time that their treatment plant is constructed.

I don't know if you want me to give the list of the names of these. It is long. We could go through this or submit this as part of the whole package.

MR. KLASHMAN: I would just like to have the names of those industries-- Not the 24 that are being held up because of the municipality. You say there are 17 others --

John Casazza

MR. CASAZZA: Right.

MR. KLASHMAN: -- that are behind schedule for other reasons.

MR. CASAZZA: All right. I'll list them.

In Chelmsford, Gilet Wool Scouring and Southwell Combing. Here again, these people are behind on their original dates. But because of Federal requirements on what is eligible and what is not eligible, we have had to have a long series of meetings about this whole thing. We have had Congressman Moss calling meetings to go over this whole matter of eligibility from the Federal level, whether or not the wastes being discharged to the system could be considered for Federal aid.

So they are behind schedule but partly because of several meetings which had to be held over the last year or so on making this determination of eligibility.

MR. KLASHMAN: That is 1 of the 17.

MR. CASAZZA: That is 2. Gilet Wool Scouring and Southwell Combing Company.

In Amesbury we have the Amesbury Metal Products, which is moving out of town. They are on a schedule, but they did not proceed with their pollution abatement but have selected to move out of town. Again, we will make certain that this is done or they will proceed with what they need.

John Casazza

But they would have ordinarily gone into maybe the municipal sewerage system.

MR. KLASHMAN: Do you know where they are moving?

MR. CASAZZA: I believe they are contemplating going to Newburyport.

MR. KLASHMAN: Do I understand that when they do go to Newburyport they will be required to --

MR. CASAZZA: Of course, we don't follow that, moving into a municipality where there is an existing municipal sewerage system. We are requiring the city of Newburyport to adopt these ordinances which I referred to.

MR. KLASHMAN: In other words, if they require pretreatment, they would have to put it in?

MR. CASAZZA: Yes. The city will require that. We have been working with Newburyport on this type of problem.

Now, Newburyport. Here again we have Chase Shawmut behind schedule, but they are under construction. So while they are theoretically behind schedule, nevertheless, they are under construction. I don't think we could ask much more than that.

The Towle Silversmith in Newburyport is behind schedule. Their sanitary waste is in the municipal system. They have to put in treatment of their own, and they are behind schedule.

John Casazza

Butcher Boy Steak House in Andover is behind schedule.

Nabnasset Laundromat in Westford is behind schedule.

I would like to point out at this point though that a lot of these places we are talking about that are behind schedule are really considered to have an insignificant amount of waste being discharged. And while we are concerned about this type of thing, we have other major problems. So some of these we may say are behind and we have not yet taken steps to do something about it. But in the meantime we have many more cases up at the Attorney General's office which we are working on. We will pick up these things if they fail to move forthwith. But first things are first.

The Berkey Photo in Fitchburg is behind schedule theoretically. However, they are working under a Federal grant as a demonstration project. So while they have missed their dates for abating pollution, this has been brought about by the fact that it has been determined that pilot plant work is needed. And the Federal government, as I say, has given money for this pilot plant work.

Fitchburg Gas and Light Company --

MR. KLASHMAN: You mean that there is a Federal grant



John Casazza

and they are being permitted to delay on that account?

MR. CASAZZA: Right.

MR. McMAHON: Mr. Chairman, I think again we are getting bogged down with a lot of little details that we can furnish you within the next 30 days. I really feel for the people in the room. I'm not too sure that they really want to hear a blow-by-blow description of 25 industries in these various towns.

The information is a matter of public record. We will be happy to provide it to you.

MR. KLASHMAN: Well, Mr. Casazza, will you just finish the rest of the list of those that are behind, the rest of the 17?

MR. CASAZZA: Well, I said the Berkey Photo. This is a demonstration project. Before they can build adequate pollution abatement facilities, they need to complete this demonstration project so they will know how to treat it.

This type of waste is a type of waste that we are not too familiar with here in this State. It is a photographic type stuff, and you just don't know how to treat it. We have the alternative of either allowing them to do all they can by going through a pilot plant test before they build the treatment or else staying out of business.

The Fitchburg Gas and Light, as I said, is going

John Casazza

out of business as soon as the new plant is built over in Salem. So they are behind schedule, but we are waiting for that new plant to be finished, which should be finished I don't know when, but not too long.

The Hollingsworth & Vose Company up in Groton. They have completed their preliminary report but we have not yet received their final plans, and they are behind schedule there.

The Atlantic Union College is behind schedule but they have been a big force behind the formation of the South Lancaster sewer district, and the district appropriated \$2.4 million just this last week. Atlantic Union will go into them.

We have the Bemis Brothers. We are reviewing their engineering report. They are behind schedule. We have found some discrepancies in the report, and they have had to have their engineers go back and update the report. So they are behind, but we are working with them on it.

We have the Rogers Brothers and Massachusetts Metalizing and Paragon Plastics up in the Fitchburg area which are behind.

The same thing with Westminster Coating and Deco-tone Products. They are behind.

These last few I have named are really discharging

John Casazza

a very small amount of pollution.

MR. KLASHMAN: These are the only ones that are behind?

MR. CASAZZA: Right. Nothing of any significance, of any major type of industry on the entire breadth. These places were picked up on subsequent investigations after we had gone down through the rivers and found the major sources of pollution. Now we are trying to pick up these smaller type wastes.

MR. KLASHMAN: Can you give us the interim dates that you have got set for these?

MR. McMAHON: Mr. Chairman, for the fourth time I will go to the well. I really think we are getting bogged down. There is no need to go into this much detail. Again, we will be happy to furnish you the information within the 30-day period.

I would think that this might be an appropriate time to have a closing statement by the participants in the conference unless someone else in the audience would like to make a presentation.

MR. KLASHMAN: I would just like to ask, Mr. McMahon, Mr. Casazza about the dates for Haverhill.

MR. McMAHON: As far as I am concerned, Mr. Casazza, why don't you take a seat and we will defer the questions on

John Casazza

Haverhill.

MR. KLASHMAN: Mr. McMahon, you are proposing then to give us these dates?

MR. CASAZZA: Those interim dates are already in here.

MR. KLASHMAN: Some of them apparently are different than what are-- Oh, well, we'll work this out.

MR. CASAZZA: We submitted the dates. You have the dates.

MR. KLASHMAN: We will get the firm dates from you that we don't have within 30 days.

MR. FITZPATRICK: Mr, Chairman, I should like to request the industrial and municipal implementation schedules or printout schedules in New Hampshire and Massachusetts for the Merrimack conference area be entered as an exhibit for the file when all of the dates are established. And in all cases these dates will be known within 30 days.

MR. KLASHMAN: In addition, we will print as part of the record a table similar to the table appearing in the second conference record of December 18, 1968, pages 311 to 324, giving a complete schedule of all the municipalities and industries listed, plus additional industries that we picked up in our discussion, giving the details of the dates for financing, completion of plans, start of construction,

and the finish of construction.

MR. McMAHON: Excuse me, Mr. Chairman. We might have one small technicality here. Again, we have agreed to furnish you whatever information you request. Our records are a matter of public record. I have a serious question as to whether Massachusetts or even New Hampshire, for that matter, would want this put into a continuing record on the Merrimack River enforcement conference.

I'm really not aware as to what legal status a workshop has in correlation with a conference proceeding. We have had two conferences on the Merrimack River already, you know. One gets continued to the next point, and one gets continued to the next. I'm not too sure just what a workshop is. I would like to have this somehow legally defined by your legal people so that we can see our way clear to actually furnish this as part of the record of the conference and not a workshop.

Again, we will furnish the information, but I think this is a technicality that really should be cleared up.

MR. KLASHMAN: Well, the only thing, Mr. McMahon, is that the conference record is a public document. And since you do not have the dates available here, the dates as we receive them must be part of that record which is available to the public, not just by coming to your office or mine.

MR. HEALY: Mr. Chairman, --



MR. KLASHMAN: Yes, Mr. Healy.

MR. HEALY: I am beginning to have the same difficulty I had yesterday. I don't want to be a disruptive force here at all, but, as I said yesterday and I am repeating here because presumably many of these people didn't attend the meeting that we had in Manchester, all of our schedules have to be modified from time to time depending upon the availability of Federal funds.

In New Hampshire I can say that, fortunately, up to this time at least, there hasn't been any difficulty in securing State aid funds to assist our municipalities in moving forward cooperatively with industry in attacking the problem of pollution. In almost every instance that I can recall, the date for industry's connection is intimately associated with the municipality. And if the municipality is unable to secure Federal funds, then it naturally is not inclined to proceed for the most part to advance this money on behalf of the Federal government.

We do have a prefinancing law. Our programs are very much the same as in Massachusetts and in neighboring States. But I am deeply concerned really about the lack of adequate Federal appropriations. And if we supply dates, as we agreed to yesterday, where we were unable to at the particular time, within this 30-day period, then it certainly is to be understood that we are doing it in good

faith, depending upon subsequently, and we hope immediately, accelerated Federal grants to move this program forward.

If we can only maintain the pace available to us at the current levels of appropriations, we are falling behind. There will be more new pollution occurring than old that we are clearing up. And this is certainly not a very happy situation.

So again I say that these dates are subject to change, with slippage depending upon the financing programs the Federal government follows.

MR. KLASHMAN: I understand what you said, Mr. Healy and Mr. McMahon. I will certainly check with our legal people in Washington on this. But it is my understanding that the schedules as submitted, the updated schedules, must be part of the record. But I will check the legality of this. It is my understanding that they will be unless there is some legal question on that.

MR. HEALY: Yes.

On a somewhat more optimistic note, I should mention that yesterday I neglected to include the comment that the town of Merrimack, which is rapidly growing, in New Hampshire, right adjacent to Nashua, was able to complete its program in advance of the schedules which we had submitted to you earlier.

This is not to say, of course, in other instances

we haven't failed. But Merrimack did have the good fortune to obtain a new industry. The Anheuser Busch people decided to locate there. The proposal was to open the plant at a certain given date, and the town was told flatly that this could happen only if the treatment plant was designed and constructed and operable by the time this brewery wished to go onstream.

The officials there did cooperate with us. We had the added good fortune of an excellent design, good supervision on the job, and a good contractor. And these circumstances enabled us to produce a more successful result than we had hoped for.

Up and down the stream in New Hampshire we have made our very best effort to speed up, realizing, of course, that the Merrimack River in the State of Massachusetts is used for drinking water supply. This is one of the considerations that was guiding us in refusing to allow the town of Merrimack to proceed without benefit of a treatment plant.

As you know, it was stated yesterday they have spent \$10 million on their own. They haven't had any Federal funds made available to them yet. We hope that this will be remedied, that there will be reimbursement -- and not too far in the future at that.

Thank you very much.

MR. KLASHMAN: Thank you, Mr. Healy.

Is there anybody else in the room who wishes to make a statement who has not been heard?

(No response)

If not, with the understanding that we will receive from both you, Mr. Healy, and you, Mr. McMahon, the detailed schedule of dates within the next 30 days, we will hold the record open until we receive those within 30 days.

Do you have any other statement, Mr. Healy?

MR. HEALY: None.

MR. KLASHMAN: Mr. McMahon?

MR. McMAHON: I would merely like to thank the people who did attend the conference, especially the people who made presentations. I certainly hope that something beneficial can come out of it, and I hope that it helps all of us in a good course of action up and down the Merrimack River insofar as good programs of waste treatment.

I think the program is going well. I hope meetings like this will have a beneficial effect in perhaps accelerating it even more.

Thank you for coming.

MR. KLASHMAN: Mr. Peloquin?

MR. PELOQUIN: Everything has been covered.

MR. KLASHMAN: Mr. Fitzpatrick?

MR. FITZPATRICK: No.

MR. KLASHMAN: The meeting then is adjourned.

(Whereupon, at 12:05 p.m., the meeting was  
adjourned.)

\* \* \*



The following material was submitted for the record following the close of the hearing:

Letter of November 18, 1970, from Lester M. Klashman to W. A. Healy, together with tables covering "Discharges to the Merrimack River and Certain Tributaries in New Hampshire (as submitted for the record by the State of New Hampshire)."

Letter of November 19, 1970, from Thomas C. McMahon to Lester M. Klashman, together with tables covering "Discharges to the Merrimack River and Certain Tributaries in Massachusetts (as submitted for the record by the Commonwealth of Massachusetts)."

Letter of October 21, 1970, from the Conservation Commission, City of Fitchburg, Massachusetts, to Federal Water Quality Administration, Boston, Massachusetts.



UNITED STATES  
DEPARTMENT OF THE INTERIOR  
FEDERAL WATER POLLUTION CONTROL ADMINISTRATION  
Northeast Region  
John F. Kennedy Federal Building  
Boston, Massachusetts 02203

November 18, 1970

RE: October 20, 1970  
Merrimack River  
Conference

Mr. William A. Healy  
Executive Director  
New Hampshire Water Supply and  
Pollution Control Commission  
Prescott Park, 105 Loudon Road  
Concord, New Hampshire 03301

Dear Mr. Healy:

This will confirm our discussion relative to your agreement to furnish us a detailed schedule for the implementation plan for the municipalities and industries, in the Merrimack River conference area, within 30 days. According to the transcript record, the dates agreed upon by you at the October 20, 1970, conference are shown in the attached table.

The dates for the completion of final plans and appropriation of funds for industries are not applicable and have been so indicated on the table. We understand that the construction date to tie in the industries to the municipal systems will start at least three months before the date that the facility is to be in operation. This has been so listed on the table.

Will you please sign and return the attached copy of this letter to indicate your concurrence with these dates.

Sincerely yours,

Lester M. Klashman  
Regional Director

Attachment

I concur that dates listed in the attached table are in accordance with our present implementation plan.

William A. Healy, Executive Director  
New Hampshire Water Supply and  
Pollution Control Commission

DISCHARGES TO THE MERRIMACK RIVER AND CERTAIN TRIBUTARIES IN NEW HAMPSHIRE  
(As submitted for the record by the State of New Hampshire)

| Municipality or Industry<br>Location - Type of Waste | Present<br>Treatment         | Proposed<br>Treatment                                                                                   | Appropriation<br>of Funds | Completion<br>of Plans | Start<br>Construction | Finish<br>Construction |
|------------------------------------------------------|------------------------------|---------------------------------------------------------------------------------------------------------|---------------------------|------------------------|-----------------------|------------------------|
| Municipal<br>Boscawen - Sanitary                     | None                         | To No. Concord<br>System                                                                                | 6/71                      | 6/70                   | 6/71                  | 12/73                  |
| Municipal<br>Concord North - Sanitary                | None                         | Primary &<br>Secondary                                                                                  | 6/71                      | 10/70                  | 6/71                  | 12/73                  |
| Municipal<br>Concord South - Sanitary                | None                         | Secondary                                                                                               | 3/73                      | 12/71                  | 4/73                  | 12/75                  |
| Penacook Fibre Co.<br>Concord                        | None                         | To No. Concord<br>System                                                                                | N.A.                      | N.A.                   | 9/73                  | 12/73                  |
| Brezner Tanning Corp.<br>Concord                     | Tied to<br>Munic. System     | Pre-treat.                                                                                              | N.A.                      | N.A.                   | 9/73                  | 12/73                  |
| Municipal<br>Berry - Sanitary                        | Secondary                    | Study under way for additions and alterations, if any, for anticipated growth, report due 6/71.         |                           |                        |                       |                        |
| Municipal<br>Franklin - Sanitary                     | None                         | Secondary                                                                                               | 12/70                     | 7/69                   | 4/71                  | 4/72                   |
| J.P. Stevens Co.<br>Franklin                         | Not in operation.            |                                                                                                         |                           |                        |                       |                        |
| Municipal<br>Hooksett - Sanitary                     | Secondary                    | --                                                                                                      |                           |                        |                       | Completed<br>7/70      |
| General Electric Co.<br>Hooksett                     | Subsurface &<br>Equalization | Adequacy of facility is under study to consider need, if any, to connect to Hooksett, report due 11/71. |                           |                        |                       |                        |
| French Bros. Beef Co.<br>Hooksett                    | Tied to<br>Munic. System     | --                                                                                                      |                           |                        |                       | Completed<br>7/70 248  |

DISCHARGES TO THE MERRIMACK RIVER AND CERTAIN TRIBUTARIES IN NEW HAMPSHIRE  
(As submitted for the record by the State of New Hampshire)

| Municipality or Industry<br>Location - Type of Waste | Present<br>Treatment | Proposed<br>Treatment | Appropriation<br>of Funds                                                                                               | Completion<br>of Plans | Start<br>Construction | Finish<br>Construction |
|------------------------------------------------------|----------------------|-----------------------|-------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------|------------------------|
| Municipal<br>Hudson - Sanitary                       | None                 | To Nashua<br>System   | Study is being made to consider connection<br>to Nashua secondary water pollution control<br>facility, report due 7/71. |                        |                       | 9/72                   |
| Franconia Paper Co.<br>Lincoln - Paper               |                      |                       |                                                                                                                         |                        |                       |                        |
|                                                      |                      |                       | Copeland Process completed. Plant not in operation.                                                                     |                        |                       |                        |
| Municipal<br>Manchester - Sanitary                   | None                 | Primary               | 2/72                                                                                                                    | 11/71                  | 4/72                  | 12/73                  |
| Municipal<br>Manchester - Sanitary                   | None                 | Secondary             | 2/74                                                                                                                    | 11/71                  | 4/74                  | 12/75                  |
| Municipal<br>Manchester - Sanitary                   | None                 | Interceptors &        | 2/73                                                                                                                    | 12/72                  | 4/73                  | 12/75                  |
| Manchester State Industrial<br>School<br>Manchester  | None                 | To Munic.<br>System   | N.A.                                                                                                                    | N.A.                   | 9/75                  | 12/75                  |
| Wauzbec Mills<br>Manchester                          | None                 | To Munic.<br>System   | N.A.                                                                                                                    | N.A.                   | 9/75                  | 12/75                  |
| Stevens Spin Co.<br>Manchester                       | None                 | To Munic.<br>System   | N.A.                                                                                                                    | N.A.                   | 9/75                  | 12/75                  |
| Seal Tanning Co.<br>Manchester                       | None                 | To Munic.<br>System   | N.A.                                                                                                                    | N.A.                   | 9/75                  | 12/75                  |

**DISCHARGES TO THE MERRIMACK RIVER AND CERTAIN TRIBUTARIES IN NEW HAMPSHIRE**  
(As submitted for the record by the State of New Hampshire)

| Municipality or Industry<br>Location - Type of Waste | Present<br>Treatment     | Proposed<br>Treatment     | Appropriation<br>of Funds | Completion<br>of Plans | Start<br>Construction | Finish<br>Construction |
|------------------------------------------------------|--------------------------|---------------------------|---------------------------|------------------------|-----------------------|------------------------|
| M. Schaefer Realty<br>Manchester                     | None                     | To Munic.<br>System       | N.A.                      | N.A.                   | 9/75                  | 12/75                  |
| M.K.M. Knitting Co.,<br>Manchester                   | None                     | To Munic.<br>System       | N.A.                      | N.A.                   | 9/75                  | 12/75                  |
| Granite State Packing Co.<br>Manchester              | None                     | To Munic.<br>System       | N.A.                      | N.A.                   | 9/75                  | 12/75                  |
| Foster Grant Co.<br>Manchester                       | None                     | To Munic.<br>System       | N.A.                      | N.A.                   | 9/75                  | 12/75                  |
| Municipal<br>Merrimack - Sanitary                    | Secondary                | Interceptors              | 4/70                      | 1/71                   | 3/71                  | 9/72                   |
| New England Pole<br>Merrimack                        | No longer discharging.   |                           |                           |                        |                       |                        |
| Anheuser Busch<br>Merrimack                          | Tied to<br>Munic. System |                           |                           |                        |                       | Completed              |
| N.H. Plating Co.<br>Merrimack                        | None                     | To Munic.<br>System       | N.A.                      | N.A.                   | 7/72                  | 10/72                  |
| Merrimack Leather Co.<br>Merrimack                   | None                     | To Munic.<br>System       | N.A.                      | N.A.                   | 7/72                  | 10/72                  |
| Municipal<br>Nashua - Sanitary                       | Part<br>Primary          | Primary &<br>Interceptors | 10/71                     | 9/70                   | 12/71                 | 12/74                  |
| Municipal<br>Nashua - Sanitary                       | Part<br>Primary          | Secondary                 | 7/73                      | 4/73                   | 11/73                 | 12/75                  |



DISCHARGES TO THE MERRIMACK RIVER AND CERTAIN TRIBUTARIES IN NEW HAMPSHIRE  
(As submitted for the record by the State of New Hampshire)

| Municipality or Industry<br>Location - Type of Waste | Present<br>Treatment                                                                                 | Proposed<br>Treatment | Appropriation<br>of Funds | Completion<br>of Plans | Start<br>Construction | Finish<br>Construct |
|------------------------------------------------------|------------------------------------------------------------------------------------------------------|-----------------------|---------------------------|------------------------|-----------------------|---------------------|
| Sanders Associates<br>(Canal St. plant)<br>Nashua    | None                                                                                                 | To Munic.<br>System   | N.A.                      | N.A.                   | 9/74                  | 12/74               |
| Johns-Manville<br>Nashua                             | Settling                                                                                             | To Munic.<br>System   | N.A.                      | N.A.                   | 9/74                  | 12/74               |
| Ferroflex Co.<br>(Pine St. extension)<br>Nashua      | Moved to other plant<br>which is connected to<br>munic. system.                                      |                       | N.A.                      | N.A.                   | N.A.                  | N.A.                |
| Brom Products, Inc.<br>Nashua                        | None                                                                                                 | To Munic.<br>System   | N.A.                      | N.A.                   | 9/74                  | 12/74               |
| Granite State Tanning Corp.<br>Nashua                | Settling                                                                                             | To Munic.<br>System   | N.A.                      | N.A.                   | 9/74                  | 12/74               |
| Sprague Electric Co.<br>Nashua                       | None                                                                                                 | To Munic.<br>System   | N.A.                      | N.A.                   | 9/74                  | 12/74               |
| Hampshire Chemical<br>Nashua                         | Domestic wastes connected to municipal system.<br>Chemical wastes treated on site with no discharge. |                       |                           |                        |                       |                     |
| Municipal<br>Plymouth - Sanitary                     | Primary                                                                                              | Secondary             | 4/71                      | 5/71                   | 6/71                  | 12/72               |
| Municipal<br>Saleen - Sanitary                       | Secondary &<br>Cl <sub>2</sub>                                                                       |                       |                           |                        |                       | Completed           |
|                                                      |                                                                                                      |                       |                           |                        |                       | 251                 |



OFFICE OF THE DIRECTOR  
DIVISION OF WATER  
POLLUTION CONTROL

# *The Commonwealth of Massachusetts*

252

*Water Resources Commission  
State Office Building, Government Center  
100 Cambridge Street, Boston 02202*

November 19, 1970

Mr. Lester Klashman, Director  
Northeastern Region  
Federal Water Quality Administration  
John F. Kennedy Building  
Boston, Massachusetts

Re: Merrimack River  
Workshop

Dear Mr. Klashman:

In accordance with agreements reached at the Merrimack River Workshop held on October 21, 1970, there are enclosed updated information on the various municipal and industrial polluters in the Merrimack River and tributaries thereto. These data are submitted for your information and use in accordance with the continuing cooperation between our two agencies. However, since you indicated that this was a workshop rather than an enforcement conference, I consider this submission an official document for inclusion in the proceedings of the workshop but not to be included in the records of any enforcement conference.

We shall continue to cooperate with members of your staff in keeping your records updated and welcome visits from them at any time.

Very truly yours,

*Thomas C. McMahon*  
Thomas C. McMahon  
Director

TCM:WAS:af  
Enclosure

**DISCHARGES TO THE MERRIMACK RIVER AND CERTAIN TRIBUTARIES IN MASSACHUSETTS**  
(As submitted by the Commonwealth of Massachusetts)

| Municipality or Industry<br>Location - Type of Waste | Present<br>Treatment | Proposed<br>Treatment           | Appropriation<br>of Funds | Completion<br>of Plans | Start<br>Construction  | Finish<br>Construction |
|------------------------------------------------------|----------------------|---------------------------------|---------------------------|------------------------|------------------------|------------------------|
| Municipal<br>Acton - Sanitary                        | Subsurface Disposal  |                                 | N/A                       | N/A                    | N/A                    | N/A                    |
| Municipal<br>Amesbury - Sanitary                     | None                 | Secondary                       | Completed<br>11/69        | 7/71                   | 9/71                   | 12/72                  |
| Amesbury Speciality Co.<br>Amesbury -                | Moved to Newburyport |                                 | N/A                       | N/A                    | N/A                    | N/A                    |
| Amesbury Metal Prod.<br>Amesbury -                   | None                 | Moving to new<br>location 12/70 | N/A                       | N/A                    | N/A                    | N/A                    |
| E. G. and G.<br>Formerly Startronics<br>Amesbury -   | None                 | Secondary                       | N/A                       | 12/70                  | 3/71                   | 7/71                   |
| Micro Fab<br>Amesbury -                              | None                 | Secondary                       | N/A                       | 12/70                  | 2/71                   | 6/71                   |
| Brazonics<br>Amesbury -                              | None                 | Secondary                       | N/A                       | 11/70                  | 1/71                   | 8/71                   |
| Merrimack Hat Co.<br>Amesbury -                      | None                 | Secondary                       | N/A                       | Approved<br>6/70       | 10/70                  | 10/71                  |
| Amesbury Fiber Co.<br>Amesbury                       | Out of Business      |                                 | N/A                       | N/A                    | N/A                    | N/A                    |
| Amesbury Tanning Co.<br>Amesbury -                   | None                 | Secondary                       | N/A                       | Approved<br>5/70 -     | Const. started<br>5/70 | 11/70                  |
| Bailey Co.<br>Amesbury -                             | None                 | Subsurface<br>Disposal          | N/A                       | Approved<br>7/70       | 7/70                   | 4/71                   |
|                                                      |                      |                                 |                           |                        |                        | 253                    |

DISCHARGES TO THE MERRIMACK RIVER AND CERTAIN TRIBUTARIES IN MASSACHUSETTS  
(As submitted by the Commonwealth of Massachusetts)

| Municipality or Industry<br>Location - Type of Waste | Present<br>Treatment                                              | Proposed<br>Treatment   | Appropriation<br>of Funds | Completion<br>of Plans | Start<br>Construction | Finish<br>Construction |
|------------------------------------------------------|-------------------------------------------------------------------|-------------------------|---------------------------|------------------------|-----------------------|------------------------|
| Municipal<br>Andover - Sanitary                      | Part None<br>Part Secondary                                       | Part of<br>GLSD         | N/A                       | N/A                    | N/A                   | N/A                    |
| Reichold Chemical<br>Andover -                       | Sanitary connected<br>to munic. system<br>Industrial<br>secondary |                         | N/A                       | Completed              | Completed             | Completed<br>10/70     |
| Municipal<br>Andover<br>(Ballardville) - Sanitary    | To Be Abandoned in 1975                                           |                         | N/A                       | N/A                    | N/A                   | N/A                    |
| Municipal<br>Ayer - Sanitary                         | Secondary                                                         | Add Cl <sub>2</sub>     | N/A                       | Completed<br>10/69     | Completed<br>5/70     | 1/71                   |
| Nyanza Chemical<br>Ashland                           | Connected to<br>Munic. System                                     |                         |                           | Completed<br>7/68      | Completed<br>8/68     | Completed<br>1/69      |
| Municipal<br>BillERICA - Sanitary                    | Secondary<br>+ Cl <sub>2</sub>                                    | Interceptor             | Completed<br>9/68         | Completed              | Completed             | Completed<br>5/70      |
| Corenco Corp<br>(Lowell Rendering)<br>BillERICA -    | Grease<br>Recovery                                                | Secondary               | N/A                       | 3/71                   | 5/71                  | 5/72                   |
| No. BillERICA Co.<br>BillERICA                       | None                                                              | Tie to<br>Municipal     | N/A                       | 3/71                   | 5/71                  | 5/72                   |
| Treble Cove Shopping Center<br>BillERICA -           | Inadequate<br>Subsurface                                          | Sub-surface<br>disposal | N/A                       | Completed<br>5/70      | 3/71                  | 5/71                   |

DISCHARGES TO THE MERRIMACK RIVER AND CERTAIN TRIBUTARIES IN MASSACHUSETTS  
(As submitted by the Commonwealth of Massachusetts)

| Municipality or Industry<br>Location - Type of Waste | Present<br>Treatment       | Proposed<br>Treatment                        | Appropriation<br>of Funds | Completion<br>of Plans | Start<br>Construction | Finish<br>Construction |
|------------------------------------------------------|----------------------------|----------------------------------------------|---------------------------|------------------------|-----------------------|------------------------|
| RCA<br>Burlington -                                  | None                       | Tie to<br>Municipal                          | N/A                       | 12/70                  | 1/71                  | 5/71                   |
| Municipal<br>Chelmsford - Sanitary                   | None                       | Secondary                                    | Completed<br>9/68         | Completed<br>9/70      | 3/71                  | 3/73                   |
| Municipal<br>Chelmsford Center - Sanitary            | None                       | Secondary                                    | 3/72                      | 3/73                   | 9/73                  | 4/75                   |
| Southwell Combing<br>Chelmsford - Scouring           | Grease<br>Recovery         | Pre-treat<br>Tie to Munic.<br>when available | N/A                       | 2/69                   | 4/69                  | 4/70                   |
| Gilet Wool Scouring<br>Chelmsford - Wool Scouring    | None                       | "                                            | N/A                       | 2/69                   | 4/69                  | 4/70                   |
| Municipal<br>Clinton - Sanitary                      | Secondary                  | Add Cl <sub>2</sub>                          | Awaiting opinion of AGO   |                        |                       |                        |
| Municipal<br>Concord - Sanitary                      | Secondary +Cl <sub>2</sub> |                                              | N/A                       | N/A                    | N/A                   | Completed              |
| Municipal<br>Dracut - Sanitary                       | None                       | Secondary                                    | 4/71                      | 6/72                   | 9/72                  | 11/74                  |
| J. P. Stevens<br>Dracut -                            | None                       | Out of business February 1, 1971             |                           |                        |                       |                        |
| Municipal<br>Fitchburg East Plant - Sanitary         | Inadequate<br>Secondary    | Secondary                                    | Completed<br>6/69         | 4/71                   | 7/71                  | 9/73                   |
|                                                      |                            |                                              |                           |                        |                       | 255                    |



DISCHARGES TO THE MERRIDACK RIVER AND CERTAIN TRIBUTARIES IN MASSACHUSETTS  
(As submitted by the Commonwealth of Massachusetts)

| Municipality or Industry<br>Location - Type of Waste                | Present<br>Treatment | Proposed<br>Treatment                         | Appropriation<br>of Funds                                                                      | Completion<br>of Plans                           | Start<br>Construction | Finish<br>Construction |
|---------------------------------------------------------------------|----------------------|-----------------------------------------------|------------------------------------------------------------------------------------------------|--------------------------------------------------|-----------------------|------------------------|
| Municipal<br>Fitchburg West Plant - Sanitary                        | None                 | Secondary                                     | Completed<br>6/69                                                                              | 4/71                                             | 7/71                  | 9/73                   |
| Fitchburg Gas and Light<br>Fitchburg -                              | None                 | Connect to<br>Munic. System<br>when available |                                                                                                | Approved<br>5/70                                 | 4/70                  | 4/72                   |
| Berkey Photo Service Inc<br>(Art Photo Service Inc.)<br>Fitchburg - | None                 | Pretreat and<br>connect to<br>Munic. System   | N/A                                                                                            | The company has received a demon. grant.<br>3/70 | 4/70                  | 4/71                   |
| Great American Chemical<br>Fitchburg                                | None                 | Secondary                                     | N/A                                                                                            | 10/70                                            | 12/70                 | 4/71                   |
| Vogue Wall Cov.<br>Fitchburg -                                      | None                 | To Municipal<br>System                        | {<br>Behind schedule due to consulting engineer.<br>Final plans will be submitted 4/71.<br>N/A | 12/69                                            | 4/70                  | 4/71                   |
| Simonds Saw and Steel<br>Fitchburg -                                | None                 | To Municipal<br>System                        |                                                                                                |                                                  |                       |                        |
| Fitchburg Paper Co.<br>Fitchburg - Paper                            | None                 | To Municipal<br>System when<br>available.     | N/A                                                                                            | 4/71                                             | 7/71                  | 9/73                   |
| Falulah Paper<br>Fitchburg - Paper                                  | Out of Business      |                                               | N/A                                                                                            | N/A                                              | N/A                   | N/A                    |
| Iver Johnson Arms and<br>Cycle Works<br>Fitchburg -                 | None                 | No longer<br>polluting<br>10/70               | N/A                                                                                            | N/A                                              | N/A                   | N/A                    |

DISCHARGES TO THE MERRIMACK RIVER AND CERTAIN TRIBUTARIES IN MASSACHUSETTS  
(As submitted by the Commonwealth of Massachusetts)

| Municipality or Industry<br>Location - Type of Waste  | Present<br>Treatment | Proposed<br>Treatment  | Appropriation<br>of Funds                 | Completion<br>of Plans | Start<br>Construction | Finish<br>Construction |
|-------------------------------------------------------|----------------------|------------------------|-------------------------------------------|------------------------|-----------------------|------------------------|
| Jennison Co.<br>Fitchburg -                           | None                 | To Municipal<br>System | N/A                                       | 3/69                   | 4/69                  | 10/69                  |
| Independent Lock Co.<br>Fitchburg -                   | None                 | Secondary              | Report & plans<br>under review by<br>DWPC | 2/70                   | 4/70                  | 6/71                   |
| Seth Thomas<br>Fitchburg                              | None                 | Secondary              | N/A                                       | Completed<br>12/69     | Completed<br>4/70     | Completed<br>10/70     |
| Weyerhaeuser Paper Co.<br>Fitchburg - Paper           | None                 | To Municipal<br>System | N/A                                       | Completed<br>3/68      | 7/71                  | 9/73                   |
| Wachusett Potato Chip<br>Fitchburg -                  | None                 | Secondary              | N/A                                       | 12/70                  | 12/70                 | 3/71                   |
| Municipal<br>Framingham - Sanitary                    | M.D.C.               | Pumping<br>Station     | Completed<br>4/68                         | 1/70                   | 10/70                 | 12/71                  |
| Municipal<br>Framingham - Beaver Brook<br>Interceptor | None                 | Connect to MDC         |                                           | 6/70                   | 11/70                 | 7/71                   |
| Roxbury Carpet<br>Framingham -                        | None                 | Tie to<br>Municipal    | N/A                                       | 11/70                  | 4/71                  | 12/71                  |
| General Motors<br>Framingham                          | None                 | Tie to<br>Municipal    | N/A                                       | Completed<br>7/68      | Completed<br>8/68     | Completed<br>11/69     |

DISCHARGES TO THE MERRIMACK RIVER AND CERTAIN TRIBUTARIES IN MASSACHUSETTS  
(As submitted by the Commonwealth of Massachusetts)

| Municipality or Industry<br>Location - Type of Waste       | Present<br>Treatment | Proposed<br>Treatment | Appropriation<br>of Funds | Completion<br>of Plans | Start<br>Construction | Finish<br>Construction |
|------------------------------------------------------------|----------------------|-----------------------|---------------------------|------------------------|-----------------------|------------------------|
| Municipal<br>Greater Lawrence S D<br>Project #1 - Sanitary | None                 | Secondary             | 6/70                      | 3/72                   | 9/72                  | 3/75                   |
| Municipal<br>Greater Lawrence S D<br>Project #2 - Sanitary | None                 | Interceptors          | 6/70                      | 3/72                   | 3/74                  | 3/76                   |
| Municipal<br>Groveland - Sanitary                          | None                 | Tie to<br>Haverhill   | Completed<br>3/70         | 12/69                  | 3/70                  | 3/71                   |
| Groton Leather Board<br>Groton -                           | None                 | Secondary             | N/A                       | 2/71                   | 4/71                  | 12/71                  |
| Hollingsworth and Vose<br>Groton -                         | Settling             | Secondary             | N/A                       | Completed<br>10/70     | 2/71                  | 2/72                   |
| Municipal<br>Haverhill<br>Project #1 - Sanitary            | None                 | Secondary             | Completed<br>4/70         | 6/71                   | 10/71                 | 6/73                   |
| Municipal<br>Haverhill<br>Project #2 - Sanitary            | None                 | Interceptor           | Completed<br>3/70         | 6/72                   | 10/72                 | 10/73                  |
| L. Hamel Leather Co.<br>Haverhill -                        | None                 | Secondary             | N/A                       | 12/71                  | 3/72                  | 12/72                  |

**DISCHARGES TO THE MERRIMACK RIVER AND CERTAIN TRIBUTARIES IN MASSACHUSETTS**  
(As submitted by the Commonwealth of Massachusetts)

| Municipality or Industry<br>Location - Type of Waste | Present<br>Treatment           | Proposed<br>Treatment                                                                                                                    | Appropriation<br>of Funds                                                                                       | Completion<br>of Plans | Start<br>Construction | Finish<br>Construction |
|------------------------------------------------------|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|------------------------|-----------------------|------------------------|
| Continental Can Co.<br>Haverhill -                   | None                           | To Municipal<br>System when<br>available                                                                                                 | N/A                                                                                                             | 3/69                   | 7/69                  | 7/70                   |
| Cowan and Shain Inc<br>Haverhill -                   | None                           | To Municipal<br>System when<br>available                                                                                                 | N/A                                                                                                             | 3/69                   | 7/69                  | 7/70                   |
| Care Ceramics<br>Haverhill -                         | None                           | To Municipal<br>System when<br>available                                                                                                 | N/A                                                                                                             | 4/69                   | 5/69                  | 6/69                   |
| CF Jameson<br>Haverhill -                            | None                           | To Municipal<br>System when<br>available                                                                                                 | N/A                                                                                                             | 3/69                   | 7/69                  | 7/70                   |
| Hoyt and Worthern<br>Tanning Co.<br>Haverhill -      | Grease and<br>Oil Recovery     | To Municipal<br>System                                                                                                                   | N/A                                                                                                             | 12/70                  | 3/71                  | 4/71                   |
| Haverhill Plating<br>Haverhill -                     | None                           | To Municipal<br>System                                                                                                                   | N/A                                                                                                             | Completed<br>3/69      | Completed<br>7/69     | Completed<br>7/70      |
| Municipal<br>Hopkinton - Sanitary                    | None                           | To prepare preliminary report and plans for agency approval<br>by 12/71, Future dates will be established upon approval<br>if necessary. |                                                                                                                 |                        |                       |                        |
| Municipal<br>Hudson - Sanitary                       | Secondary<br>+ Cl2             | Pumping<br>Station                                                                                                                       | 9/68                                                                                                            | Completed<br>2/69      | 12/70                 | 7/71                   |
| Atlantic Union College<br>Lancaster - Sanitary       | Part Primary<br>Part Secondary | Part Primary<br>Part Secondary                                                                                                           | Received permission to join the Lancaster Sewer<br>District which was recently created by a legislative<br>act. |                        |                       |                        |

DISCHARGES TO THE MERRIMACK RIVER AND CERTAIN TRIBUTARIES IN MASSACHUSETTS  
(As submitted by the Commonwealth of Massachusetts)

| Municipality or Industry<br>Location - Type of Waste | Present<br>Treatment | Proposed<br>Treatment | Appropriation<br>of Funds                                                                                                                                                                                                                                                                                                                                                                     | Completion<br>of Plans | Start<br>Construction | Finish<br>Construction |
|------------------------------------------------------|----------------------|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------------|------------------------|
| Municipal<br>Lawrence - Sanitary<br>Project #1       | None                 | Part of<br>GLSD       | N/A                                                                                                                                                                                                                                                                                                                                                                                           | N/A                    | N/A                   | N/A                    |
| Municipal<br>Lawrence - Sanitary<br>Project #2       | None                 | Part of<br>GLSD       | N/A                                                                                                                                                                                                                                                                                                                                                                                           | N/A                    | N/A                   | N/A                    |
| Merrimack Paper Co.<br>Lawrence - Paper              | None                 | Tie to<br>Municipal   | The following companies are dependant upon the<br>GLSD. To date the district has completed a<br>preliminary report and plan and have appropriated<br>funds for final plans, and is moving ahead to the<br>satisfaction of the Division. Industries adjacent<br>to the sewer line will have interceptors constructed<br>under phase I; those adjacent to phase II will<br>have phase II dates. |                        |                       |                        |
| Mead Corp.<br>Lawrence - Paper                       | None                 | Tie to<br>Municipal   |                                                                                                                                                                                                                                                                                                                                                                                               |                        |                       |                        |
| Lawrence Wool Scouring<br>Lawrence - Wool Scouring   | Grease<br>Recovery   | Tie to<br>Municipal   |                                                                                                                                                                                                                                                                                                                                                                                               |                        |                       |                        |
| Agawam Dye Works<br>Lawrence - Dyeing                | None                 | Tie to<br>Municipal   |                                                                                                                                                                                                                                                                                                                                                                                               |                        |                       |                        |
| Oxford Paper Co.<br>Lawrence - Paper                 | None                 | Tie to<br>Municipal   |                                                                                                                                                                                                                                                                                                                                                                                               |                        |                       |                        |
| Municipal<br>Leominster - Sanitary                   | Secondary            | Secondary             | In process of enlarging existing facilities with<br>CL <sub>2</sub> on a voluntary basis to accommodate the two<br>industries Foster Grant and Borden Chemical.<br>Completed 11/68      Completed 3/69      Completed 12/69                                                                                                                                                                   |                        |                       |                        |
| Foster Grant<br>Leominster -                         | Lagoon               | Secondary             |                                                                                                                                                                                                                                                                                                                                                                                               |                        |                       |                        |



DISCHARGES TO THE MERRIMACK RIVER AND CERTAIN TRIIBUTARIES IN MASSACHUSETTS  
(As submitted by the Commonwealth of Massachusetts)

| Municipality or Industry<br>Location - Type of Waste | Present<br>Treatment                                                                                                                                        | Proposed<br>Treatment  | Appropriation<br>of Funds | Completion<br>of Plans | Start<br>Construction | Finish<br>Construction |
|------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|---------------------------|------------------------|-----------------------|------------------------|
| Borden Chemical Inc.<br>Leominster -                 | Lagoons                                                                                                                                                     | Secondary              |                           | Completed<br>6/69      | Completed<br>7/69     | Completed<br>7/70      |
| Paragon Plastics<br>Leominster -                     | Has undertaken a sampling program and when this is completed, the Division will issue additional dates for completion of their pollution abatement program. |                        |                           |                        |                       |                        |
| Mass Metalizing<br>Leominster -                      | Going out of business 12/70                                                                                                                                 |                        |                           |                        |                       |                        |
| New England Apple Products<br>Littleton -            | Subsurface<br>Disposal                                                                                                                                      |                        | N/A                       | Completed<br>6/69      | Completed<br>10/69    | Completed<br>3/70      |
| Municipal<br>Lowell - Sanitary<br>Project #1         | None                                                                                                                                                        | Secondary              | Completed<br>7/69         | 1/71                   | 4/71                  | 4/73                   |
| Municipal<br>Lowell - Sanitary<br>Project #2         |                                                                                                                                                             | Intersectors           | 1/72                      | 1/73                   | 4/73                  | 4/75                   |
| Commodore Foods Co.<br>Lowell -                      | None                                                                                                                                                        | To Municipal<br>System | N/A                       | N/A                    | 6/71                  | 6/73                   |
| Byfield Felting<br>Lowell -                          | None                                                                                                                                                        | To Municipal<br>System | N/A                       | N/A                    | 6/71                  | 6/73                   |
| Ames Textile<br>Lowell - Textile                     | None                                                                                                                                                        | To Municipal<br>System | N/A                       | N/A                    | 6/71                  | 6/73                   |

DISCHARGES TO THE MERRIMACK RIVER AND CERTAIN TRIIBUTARIES IN MASSACHUSETTS  
(As submitted by the Commonwealth of Massachusetts)

| Municipality or Industry<br>Location - Type of Waste | Present<br>Treatment | Proposed<br>Treatment              | Appropriation<br>of Funds | Completion<br>of Plans | Start<br>Construction | Finish<br>Construction |
|------------------------------------------------------|----------------------|------------------------------------|---------------------------|------------------------|-----------------------|------------------------|
| Vertipile Inc.<br>Lowell -                           | Centrifuges          | To Municipal<br>System when avail. | N/A                       | N/A                    | 6/71                  | 6/73                   |
| Suffolk Knitting Co.<br>Lowell -                     | None                 | To Municipal<br>System when avail. | N/A                       | N/A                    | 6/71                  | 6/73                   |
| Robinson Top and Yarn Dye<br>Lowell -                | None                 | To Municipal<br>System when avail. | N/A                       | N/A                    | 6/71                  | 6/73                   |
| Pellon Corp.<br>Lowell -                             | None                 | To Municipal<br>System when avail. | N/A                       | N/A                    | 6/71                  | 6/73                   |
| Middlesex Worsted<br>Spinning Co. Inc.<br>Lowell -   | None                 | To Municipal<br>System when avail. | N/A                       | N/A                    | 6/71                  | 6/73                   |
| Jean Alan Products<br>Lowell -                       | None                 | To Municipal<br>System when avail. | N/A                       | N/A                    | 6/71                  | 6/73                   |
| Conant Houghton<br>(United Elastic)<br>Lowell -      | None                 | To Municipal<br>System when avail. | N/A                       | N/A                    | 6/71                  | 6/73                   |
| Vogue Silver<br>Lowell -                             | None                 | Insignificant<br>Waste             | N/A                       | N/A                    | N/A                   | N/A                    |
| Lawrence Mfg. Co.<br>Lowell -                        | None                 | To Municipal<br>System when avail. | N/A                       | N/A                    | 6/71                  | 6/73                   |

DISCHARGES TO THE MERRIMACK RIVER AND CERTAIN TRIBUTARIES IN MASSACHUSETTS  
(As submitted by the Commonwealth of Massachusetts)

| Municipality or Industry<br>Location - Type of Waste | Present<br>Treatment           | Proposed<br>Treatment  | Appropriation<br>of Funds                                                                              | Completion<br>of Plans | Start<br>Construction | Finish<br>Construction |
|------------------------------------------------------|--------------------------------|------------------------|--------------------------------------------------------------------------------------------------------|------------------------|-----------------------|------------------------|
| Raytheon<br>Lowell -                                 | None                           | Secondary              | N/A                                                                                                    | 11/70                  | 4/71                  | 9/71                   |
| Roger Bros.<br>Lunenburg                             | None                           | To relocate<br>in 1971 | N/A                                                                                                    | N/A                    | N/A                   | N/A                    |
| Municipal<br>Marlborough - Sanitary<br>East Section  | Secondary<br>+ Cl <sub>2</sub> | Phosphate<br>Removal   | Awaiting submission of pilot plant studies. Dates<br>will be established when study has been received. |                        |                       |                        |
| Municipal<br>Marlborough - Sanitary<br>West Section  | Secondary<br>+ Cl <sub>2</sub> |                        | Completed<br>2/68                                                                                      | Completed<br>7/68      | Completed<br>9/68     | Completed<br>10/69     |
| Municipal<br>Maynard - Sanitary                      | Inadequate<br>Secondary        | Secondary              | Completed<br>3/69                                                                                      | 2/70                   | 4/70                  | 4/71                   |
| Digital Equipment Co.<br>Maynard -                   | Tied to<br>Maynard             | None                   | N/A                                                                                                    | N/A                    | N/A                   | N/A                    |
| Municipal<br>Merrimac - Sanitary                     | None                           | Secondary              | Completed<br>2/70                                                                                      | 1/72                   | 4/72                  | 1/74                   |
| Merrimac Metal Finishing<br>Merrimac -               | Orders to be issued.           |                        |                                                                                                        |                        |                       |                        |
| Municipal<br>Methuen -<br>Project #1                 | None                           | Part of<br>CUSD        | N/A                                                                                                    | N/A                    | N/A                   | N/A                    |

DISCHARGES TO THE MERRIMACK RIVER AND CERTAIN TRIBUTARIES IN MASSACHUSETTS  
(As submitted by the Commonwealth of Massachusetts)

| Municipality or Industry<br>Location - Type of Waste              | Present<br>Treatment         | Proposed<br>Treatment                | Appropriation<br>of Funds | Completion<br>of Plans | Start<br>Construction | Finish<br>Construction |
|-------------------------------------------------------------------|------------------------------|--------------------------------------|---------------------------|------------------------|-----------------------|------------------------|
| Municipal<br>Methuen -<br>Project #2                              | None                         | Part of<br>GLSD                      | N/A                       | N/A                    | N/A                   | N/A                    |
| Essex Chrome Plating Co.<br>Methuen -                             | None                         | Secondary                            | N/A                       | 1/69                   | 4/69                  | 4/71                   |
| Municipal<br>Newburyport - Sanitary                               | Primary<br>+ Cl <sub>2</sub> | Secondary                            |                           | 2/71                   | 4/71                  | 4/72                   |
| Chase Shawmut Co.<br>Newburyport -                                | Tied to Munic.<br>System     |                                      | N/A                       | Completed<br>2/69      | Completed<br>11/69    | Completed<br>5/70      |
| Towle Silversmith<br>Newburyport -                                | None                         | Secondary                            | N/A                       | 2/71                   | 4/71                  | 7/71                   |
| Municipal<br>North Andover - Sanitary                             | None                         | Part of<br>GLSD                      | N/A                       | N/A                    | N/A                   | N/A                    |
| Western Electric Company<br>North Andover - Sanitary<br>& Plating | Neutralization<br>Secondary  |                                      | N/A                       | Completed<br>1/69      | Completed<br>3/69     | Completed<br>3/70      |
| Wipex Inc.<br>North Andover -                                     | None                         | Out of business                      | N/A                       | N/A                    | N/A                   | N/A                    |
| Butcher Boy Steak House<br>North Andover                          | Inadequate<br>Subsurface     | Subsurface or to<br>Municipal System |                           | Completed<br>6/70      |                       | 10/69                  |
|                                                                   |                              |                                      |                           |                        | Court action pending  |                        |

DISCHARGES TO THE MERRIMACK RIVER AND CERTAIN TRIBUTARIES IN MASSACHUSETTS  
(As submitted by the Commonwealth of Massachusetts)

| Municipality or Industry<br>Location - Type of Waste | Present<br>Treatment   | Proposed<br>Treatment                                                         | Appropriation<br>of Funds                 | Completion<br>of Plans | Start<br>Construction | Finish<br>Construction |
|------------------------------------------------------|------------------------|-------------------------------------------------------------------------------|-------------------------------------------|------------------------|-----------------------|------------------------|
| Municipal<br>Northborough - Sanitary                 | None                   | To Marlborough<br>WPCF                                                        | Negotiating with the town of Marlborough. |                        |                       |                        |
| Machinery Electrification<br>Northborough -          | None                   | To Municipal<br>System                                                        | N/A                                       | 3/73                   | 5/73                  | 5/74                   |
| Lawrence Candle Co.<br>Northborough -                | None                   | To Municipal<br>System                                                        | N/A                                       | 3/73                   | 5/73                  | 5/74                   |
| Municipal<br>Pepperell - Sanitary                    | None                   | Secondary                                                                     | 4/70                                      | 2/71                   | 5/71                  | 6/72                   |
| St. Regis Paper<br>Pepperell - Paper                 | None                   | Secondary                                                                     | N/A                                       | 12/70                  | 3/71                  | 11/71                  |
| Bemis Co. Inc.<br>Pepperell -                        | None                   | Secondary                                                                     | N/A                                       | 3/70                   | 5/70                  | 5/71                   |
| Municipal<br>Salisbury                               | None                   | { Engaged engineer, have requested an extension<br>for final plan submission. |                                           | 2/71                   | 4/71                  | 4/72                   |
| Salisbury Center - Sanitary                          | None                   | Ocean Discharge                                                               | 3/70                                      | 2/71                   | 4/71                  | 4/72                   |
| Salisbury Water Co.<br>Salisbury -                   | None                   | To Municipal<br>System when avail.                                            |                                           |                        |                       |                        |
| Allen Drive Subdivision<br>Salisbury -               | Subsurface<br>Disposal |                                                                               | N/A                                       | Completed<br>6/69      | Completed<br>8/69     | Completed<br>10/69     |



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| Municipality or Industry<br>Location - Type of Waste             | Present<br>Treatment                | Proposed<br>Treatment  | Appropriation<br>of Funds | Completion<br>of Plans | Start<br>Construction | Finish<br>Construction |
|------------------------------------------------------------------|-------------------------------------|------------------------|---------------------------|------------------------|-----------------------|------------------------|
| Municipal<br>Shrewsbury -                                        | Secondary<br>+ Cl <sub>2</sub>      |                        | N/A                       | N/A                    | N/A                   | Completed              |
| Municipal<br>Sudbury -                                           | Subsurface<br>Disposal              |                        | N/A                       | N/A                    | N/A                   | N/A                    |
| State Hospital<br>Tewksbury - Sanitary                           | Secondary<br>+ Cl <sub>2</sub>      |                        | Adequate facilities       |                        |                       |                        |
| Liquid Carbonics<br>Tewksbury -                                  | Subsurface<br>Disposal              |                        | N/A                       | N/A                    | Completed<br>6/70     | Completed<br>8/70      |
| Coin Operated Laundry<br>Tewksbury -                             | No longer polluting                 |                        | N/A                       | N/A                    | N/A                   | N/A                    |
| Municipal<br>Tyngsborough - Sanitary                             | None                                | Subsurface<br>Disposal |                           | 12/70                  | 4/71                  | 4/72                   |
| Notre Dame Academy<br>Tyngsborough -                             | Inadequate<br>Secondary             | Secondary              | N/A                       | Completed              | Completed             | 5/71                   |
| Advance Coating Inc.<br>Westminster -                            | Secondary                           |                        | N/A                       | Completed              | Completed             | Completed              |
| Decotone Products Div.<br>(Fitchburg Paper Co.)<br>Westminster - | Subsurface<br>Disposal<br>Completed |                        | N/A                       | Completed<br>12/69     | Completed<br>4/70     | Completed<br>10/70     |

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| Municipality or Industry<br>Location - Type of Waste | Present<br>Treatment    | Proposed<br>Treatment | Appropriation<br>of Funds | Completion<br>of Plans | Start<br>Construction | Finish<br>Construction |
|------------------------------------------------------|-------------------------|-----------------------|---------------------------|------------------------|-----------------------|------------------------|
| Old Mill Restaurant<br>Westminster -                 | None                    | Secondary             | N/A                       | 11/70                  | 2/71                  | 4/71                   |
| Municipal<br>Westborough - Sanitary                  | Inadequate<br>Secondary | Secondary             | N/A                       | N/A                    | Completed<br>7/68     | 6/69                   |
| Mabnasset Laundry<br>Westford -                      | No longer polluting     |                       | N/A                       | N/A                    | N/A                   | N/A                    |



# City of Fitchburg

MASSACHUSETTS

01420

## *Conservation Commission*

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Oct. 21, 1970

Mr. Allyn Hemerway  
Fed. Water Quality Administration  
Boston, Mass.

My dear Mr. Hemerway,

In lieu of attending today's Workshop which unfortunately I had to miss, this is to write and inform you that Fitchburg, Mass. is doing it's share to meet the implementation schedule necessary to be able to complete the job of Water Pollution Control provided that State and Federal promised monies are made available when the city is ready to begin construction this next year.

We are concerned that new rules and regulations have been adopted by the U.S. Dept. of the Interior which would affect the construction of Municipal Waste Water Facilities that include Industries, adversely.

most respectfully submitted  
and most truly yours

NRWA Steering Com.  
Ch. Fitchburg Conservation Com.

Miss Madeleine Gaylor  
5 Prospect Street  
Fitchburg, Mass.